

EXHIBIT 2

Final Environmental Assessment and Draft Finding of No Significant Impact (FONSI) for Central Business District (CBD) Tolling Program Manhattan, New York

Submitted Pursuant to 42 U.S.C. 4332(2)(c), 23 U.S.C. 138, and 49 U.S.C. 303

by

U.S. Department of Transportation, Federal Highway Administration (FHWA)

Triborough Bridge and Tunnel Authority (TBTA)¹

New York State Department of Transportation (NYSDOT)

New York City Department of Transportation (NYCDOT)

This Final Environmental Assessment (EA) and Section 4(f) *de minimis* finding document the environmental effects of the Central Business District (CBD) Tolling Program (the “Project”) in New York County, New York, and surrounding areas of New York City and New York State, New Jersey, and Connecticut.² The Manhattan CBD is the commercial center of a 28-county region that surrounds and includes New York City. **The high density of jobs and residents and the large number of visitors in the Manhattan CBD, has contributed to traffic congestion and delays, slowing travel and jeopardizing the vitality of the area.** The Project purpose is to reduce traffic congestion in the Manhattan CBD in a manner that will generate revenue for future transportation improvements, pursuant to acceptance into the FHWA Value Pricing Pilot Program.

The Final EA was prepared consistent with the Council on Environmental Quality and FHWA’s National Environmental Policy Act regulations, as codified in 40 Code of Federal Regulations (CFR) Parts 1500–1508 and 23 CFR 771 respectively to evaluate the potential environmental impacts of, and identify mitigation measures for, the Project, in consideration of public and agency input. The Final EA responds to comments received from the public and agencies on the EA that was published in August 2022.

After careful consideration of a range of alternatives, FHWA and the Project Sponsors (comprising TBTA, NYSDOT, and NYCDOT) have studied the No Action Alternative and the CBD Tolling Alternative for the Project. The Project Sponsors recommend the CBD Tolling Alternative for the Project, and the FHWA has issued a draft Finding of No Significant Impact (FONSI). The official 30-day public availability period for the Final EA and draft FONSI will conclude on June 12, 2023, after which time the FHWA will issue a final agency decision for the Project.

¹ TBTA is an affiliate of the Metropolitan Transportation Authority (MTA).

² As defined for this Project, the 28-county region includes:

- New York City counties (Bronx, Kings [Brooklyn], New York [Manhattan], Queens, and Richmond [Staten Island])
- Long Island counties (Nassau and Suffolk)
- New York counties North of New York City (Dutchess, Orange, Putnam, Rockland, and Westchester)
- New Jersey counties (Bergen, Essex, Hudson, Hunterdon, Mercer, Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, Sussex, Union, and Warren)
- Connecticut counties (Fairfield and New Haven)

Summary of Comments on CBD Tolling Final EA_Chapters_Combined - COMMENTS.pdf

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This assumption takes into account the situation in the CBD prior to COVID. Given the increase in empty office space in Manhattan due to full or partial remote work, we believe this assumption requires further analysis. Post-COVID, we suggest that the analysis should take into account the impact of stationary structures in the driving lanes such as dining sheds, garbage bin, Citibike racks, boulders, palnters, and unplanned plazas,

1 WHY IS THE CBD TOLLING PROGRAM BEING CONSIDERED?

Traffic congestion has been a problem in the Manhattan CBD for many years,⁷ and has been one of New York City's most challenging policy problems for generations. As the regional population and commerce have grown, traffic has snarled with such regularity over the years that a new word was created to describe it: gridlock.⁸

NYCDOT, MTA, and other transportation agencies have implemented programs to reduce congestion, and improve transit, pedestrian, and bicycle accessibility in and to the Manhattan CBD. NYCDOT has repurposed curbside parking to establish bicycle lanes and increased pedestrian space with sidewalk and corner bump outs. It has also converted curbside lanes and general-purpose traffic lanes to dedicated bus lanes on certain Manhattan avenues and east–west, crosstown streets.

Additionally, MTA and other transit agencies offer reduced transit fares for the elderly, disabled, and school-aged children, and in early 2022, MTA implemented fare capping as part of its new fare system rollout (OMNY), which allows free, unlimited rides to customers the rest of the week once they have spent \$33 (the same as taking 12 trips). Many employers participate in a Federal program that allows employees to use pre-tax dollars to pay for transit, and many companies have adopted flexible work schedules, including options to work remotely.

Figure ES-3. Most Congested Urban Areas (2021)

United States
1. New York, NY
2. Chicago, IL
3. Philadelphia, PA
4. Boston, MA
5. Miami, FL

Source: INRIX, 2021

Despite these traffic-reduction initiatives, and despite the existence of the country's most extensive and robust public transit network, traffic congestion persists. In 2020 and 2021, New York City's traffic congestion ranked worst among the cities in the United States (**Figure ES-3**).⁹

State and City of New York officials and stakeholder and advocacy groups have conducted multiple studies over the past 45 years to determine the most effective way to address congestion in the Manhattan CBD. These studies overwhelmingly pointed to congestion pricing, or introduction of tolls based on traffic levels, as the most effective tool. **Chapter 2, "Project Alternatives," and Appendix 2A, "Project Alternatives: Previous Studies and Concepts Considered,"** provide more information about other alternatives and these earlier studies.

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Given that the CBD and congestion pricing was proposed prior to COVID, we suggest that there is another review of the assumptions as to population, work, etc. in the CBD.

PROJECT PURPOSE, NEED, AND OBJECTIVES

The Project purpose is to reduce traffic congestion in the Manhattan CBD in a manner that will generate revenue for future transportation improvements, pursuant to acceptance into FHWA's VPPP.

1 Why do we need to reduce traffic congestion?

Low travel speeds and unreliable travel times to, from, and within the Manhattan CBD increase commute and travel times for vehicles using the roadways, erode worker productivity, reduce bus and paratransit service quality, raise the cost of deliveries and the overall cost of doing business, and delay emergency vehicles. Thus, there is a need to reduce vehicle congestion in the Manhattan CBD to improve the reliability and efficiency of the transportation system.



Why do we need money for transit investment?

“The only way to end traffic jams in Manhattan and the approaches to it is by making public transportation better.”
Regional Plan Association, Regional Plan News, No. 82,
February 1966

Transit is critical to New York City's overall economy, and to the region's residents, workers, and visitors, and continued investment in transit is necessary to ensure ongoing mobility and accessibility. ***[Indeed, MTA's transit system, and particularly the bus network, promotes equity by serving low-income and minority communities.]***

In 2019, MTA subways served 1.7 billion passengers and MTA buses carried 677.6 million passengers, providing access to employment, healthcare, education and the full range of services and entertainment options available throughout New York City. The 10 busiest subway stations in the MTA system are in the Manhattan CBD, and two of the 10 busiest MTA bus routes are in or serve the Manhattan CBD.¹⁰ The Long Island Rail Road and Metro-North Railroad were the busiest commuter rail systems in the United States in 2019, and Penn Station New York and Grand Central Terminal, both within the Manhattan CBD, are the two busiest passenger rail stations in North America.¹¹

Congestion by the Numbers

Cost of Congestion: 102 hours of lost time; nearly \$1,595 per year per driver in the New York City region.*

Travel Speeds: Decreased **[23%]** in the Manhattan CBD, from 9.1 miles per hour (mph) to 7.1 mph between 2010 and 2019.**

FHV Registrations: Tripled in New York City, from fewer than 40,000 to more than 120,000 between 2010 and 2019. Due to the effects of the COVID-19 pandemic and the city's continued cap on FHV registrations, the number of FHVs making trips fell to 70,000 by April 2022.†

Local Bus Speeds: Declined 28% in the Manhattan CBD since 2010. The average speed of Select Bus Service (New York City Transit's bus rapid transit service) routes in Manhattan are 19% slower than Select Bus Service routes in other boroughs.††

Sources:





* INRIX 2021 Global Traffic Scorecard. <https://inrix.com/scorecard-city/?city=New%20York%20City%20NY&index=5>

** NYCDOT. August 2019. New York City Mobility Report. <https://www1.nyc.gov/html/dot/downloads/pdf/mobility-report-print-2019.pdf>.

† New York City Taxi and Limousine Commission and NYCDOT. June 2019. *Improving Efficiency and Managing Growth in New York's For-Hire Vehicle Sector*; NYC TLC FHV trip data.

†† NYCDOT. August 2019. New York City Mobility Report. <https://www1.nyc.gov/html/dot/downloads/pdf/mobility-report-print-2019.pdf>. New York City Transit analysis.

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-  Number: 1 Author: BPC Resident Subject: Highlight Date: 6/12/23, 5:55:19 AM
Has there been analysis of the delays in completing roadwork? Has there been an analysis on how these delays contribute to the traffic congestion in the CBD?
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-  Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 5:58:11 AM
Has the analysis reviewed the impact of bike lanes, bus lanes, and delays in construction on congestion in the CBD?
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-  Number: 3 Author: BPC Resident Subject: Highlight Date: 6/12/23, 6:00:52 AM
Has the analysis reviewed the impact of Uber and other such apps?
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-  Number: 4 Author: BPC Resident Subject: Highlight Date: 6/12/23, 6:02:25 AM
The data only shows a correlation to traffic signal sequencing changes done in something called project "Green Wave", where the speed of travel has been changed from 25mph to 15mph.

MTA employs approximately 70,000 people, making it one of the largest individual employers in New York State (and larger than many small cities).¹¹ Through its capital spending, MTA annually injects billions of dollars into the local economy, both through major infrastructure projects and day-to-day operations and maintenance programs, indirectly supporting thousands of additional jobs far beyond its direct employment.¹²

Beginning in 2017, MTA's operating agencies engaged in projects to address some root causes of declining service that had begun in 2010 and implemented improvements to commuter rail and subway infrastructure. As documented in MTA's 2020–2024 Capital Program, these projects resulted in substantial reductions in delay and improvements in on-time performance.¹³

Elements of MTA's commuter rail and subway system are more than 100 years old, and essential capital needs remain to ensure a state of good repair and to bring MTA's transit and rail assets into the 21st Century. The 2020–2024 Capital Program is intended to “build on these achievements, ensuring that the improvements put in place will be sustainable for years to come.”¹⁴ The program identifies \$52.0 billion of investments¹⁵ in the region's subways, buses, and commuter railroads. The following are key tenets of the 2020–2024 Capital Program.

- Investing to improve reliability
- Committing to environmental sustainability
- Building an accessible transit system for all New Yorkers
- Easing congestion and creating growth
- Improving safety and customer service through technology¹⁶

What are the Project objectives?

FHWA and the Project Sponsors have established the following objectives to further refine the Project purpose and address the needs described above.

- Reduce daily vehicle-miles traveled (VMT) within the Manhattan CBD by at least 5 percent
- Reduce the number of vehicles entering the Manhattan CBD daily by at least 10 percent
- Create a funding source for capital improvements and generate sufficient annual net revenues to fund \$15 billion for capital projects for the MTA Capital Program
- Establish a tolling program consistent with the purposes underlying the New York State legislation entitled the MTA Reform and Traffic Mobility Act¹⁷

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Did the study analyze the percentage of street congestion in the CBD that is generated as a direct result of the MTA's construction projects?

Table ES-1. Results of Preliminary Alternatives Screening¹

ALTERNATIVE	PURPOSE AND NEED: Reduce traffic congestion in the Manhattan CBD in a manner that will generate revenue for future transportation improvements	OBJECTIVE 1: Reduce daily vehicle-miles traveled (VMT) within the Manhattan CBD Criterion: Reduce by 5% (relative to No Action)	OBJECTIVE 2: Reduce the number of vehicles entering the Manhattan CBD daily Criterion: Reduce by 10% (relative to No Action)	OBJECTIVE 3: Create a funding source for capital improvements and generate sufficient annual net revenues to fund \$15 billion for capital projects for MTA's Capital Program
NA-1: No Action	Does not meet	Does not meet	Does not meet	Does not meet
NTP-1: Parking pricing strategies	Does not meet	Does not meet (see note 2)	Does not meet	Does not meet (see note 2)
T-1: Pricing on full roadways: Raise tolls or implement variable tolls on existing toll facilities	Does not meet	Does not meet (see note 3)	Does not meet (see note 3)	Does not meet
T-2: Pricing on full roadways: Toll East and Harlem River bridges	Does not meet (see note 4)	Meets	Meets	Does not meet (see note 4)
T-3: High-occupancy toll (HOT) lanes	Does not meet (see note 5)	Does not meet	Does not meet	Does not meet (see note 5)
T-4: Zone-based pricing: CBD Tolling Program	Meets	Meets	Meets	Meets
O-1: Parking pricing: Reduce government-issued parking permits	Does not meet	<i>[Does not meet (see note 6)]</i>	<i>[Does not meet (see note 6)]</i>	Does not meet
O-2: Provide additional taxi stands to reduce cruising	Does not meet	Does not meet (see note [7])	Does not meet	Does not meet
O-3: Create incentives for teleworking	Does not meet	Does not meet	Does not meet (see note [8])	Does not meet
O-4: Ration license plates	Does not meet	Meets	Meets	Does not meet
O-5: Mandatory carpooling	Does not meet	Meets	Meets	Does not meet
1-6: Truck time-of-day delivery restrictions	Does not meet	Does not meet (see note [9])	Does not meet (see note [9])	Does not meet

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Missing study on alternatives:

1. What impact have the bike lanes had since implementation?
2. What impact have the bus lanes had since exclusive use fines?

Table ES-2. Tolling Scenarios Evaluated for the CBD Tolling Alternative

PARAMETER ¹	SCENARIO A	SCENARIO B	SCENARIO C	SCENARIO D	SCENARIO E	SCENARIO F	SCENARIO G
	Base Plan	Base Plan with Caps and Exemptions	Low Crossing Credits for Vehicles Using Tunnels to Access the CBD, with Some Caps and Exemptions	High Crossing Credits for Vehicles Using Tunnels to Access the CBD	High Crossing Credits for Vehicles Using Tunnels to Access the CBD, with Some Caps and Exemptions	High Crossing Credits for Vehicles Using Manhattan Bridges and Tunnels to Access the CBD, with Some Caps and Exemptions	Base Plan with Same Tolls for All Vehicle Classes
Time Periods²							
Peak: Weekdays	6 a.m. to 8 p.m.	6 a.m. to 8 p.m.	6 a.m. to 8 p.m.	6 a.m. to 8 p.m.	6 a.m. to 8 p.m.	6 a.m. to 10 a.m.; 4 p.m. to 8 p.m.	6 a.m. to 8 p.m.
Peak: Weekends	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.
Off Peak: Weekdays	8 p.m. to 10 p.m.	8 p.m. to 10 p.m.	8 p.m. to 10 p.m.	8 p.m. to 10 p.m.	8 p.m. to 10 p.m.	10 a.m. to 4 p.m.	8 p.m. to 10 p.m.
Overnight: Weekdays	10 p.m. to 6 a.m.	10 p.m. to 6 a.m.	10 p.m. to 6 a.m.	10 p.m. to 6 a.m.	10 p.m. to 6 a.m.	8 p.m. to 6 a.m.	10 p.m. to 6 a.m.
Overnight Weekends	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.
Potential Crossing Credits							
Credit Toward the CBD Toll for Tolls Paid at the Queens-Midtown, Hugh L. Carey, Lincoln, Holland Tunnels	No	No	Yes	Yes	Yes	Yes	No
Credit Toward the CBD Toll for Tolls Paid at the Robert F. Kennedy, Henry Hudson, George Washington Bridges	No	No	No	No	No	Yes	No
Potential Exemptions and Limits (Caps) on Number of Tolls per Day							
Cars, motorcycles, commercial vans	Once per day	Once per day	Once per day	Once per day	Once per day	Once per day	Once per day
Taxis	No cap	Once per day	Exempt	No cap	Exempt	Once per day	No cap
FHVs	No cap	Once per day	Three times per day	No cap	Three times per day	Once per day	No cap
Small and large trucks	No cap	Twice per day	No cap	No cap	No cap	Once per day	No cap
Buses	No cap	Exempt	No cap	No cap	Transit buses—Exempt No cap on others	Exempt	No cap
Approximate Toll Rate Assumed³							
Peak	\$9	\$10	\$14	\$19	\$23	\$23	\$12
Off Peak	\$7	\$8	\$11	\$14	\$17	\$17	\$9
Overnight	\$5	\$5	\$7	\$10	\$12	\$12	\$7

¹ The parameters in this table were assumed for modeling purposes to evaluate the range of potential effects that would result from implementation of the CBD Tolling Alternative. Actual toll rates, potential credits, exemptions and/or discounts, and the time of day when toll rates would apply would be determined by the TBTA Board after recommendations are made by the Traffic Mobility Review Board. **Appendix 2E, “Project Alternatives: Definition of Tolling Scenarios,”** provides more detailed information on the rates, potential crossing credits, exemptions, and/or discounts assumed for each tolling scenario.

² Tolls would be higher during peak periods when traffic is greatest. These would be set forth by TBTA in the final toll schedule. All tolling scenarios include a higher toll on designated “Gridlock Alert” days, although the modeling conducted for the Project did not reflect this higher toll since it considers typical days rather than days with unusually high traffic levels.

³ Toll rates are for autos, commercial vans, and motorcycles using E-ZPass and are rounded. For all tolling scenarios, different rates would apply for vehicles not using E-ZPass; for Tolling Scenarios A through F, different vehicle classes would pay different tolls (see **Appendix 2E, “Definition of Tolling Scenarios.”**). The peak E-ZPass rate (rounded) range across tolling scenarios for small trucks would be \$12-\$65; for large trucks, the range would be \$12-\$82.

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All other tolling processes locally as well as country-wide are subject to vehicle size classes. Why are the CBD proposals not applying these necessary distinctions? Example: <https://new.mta.info/document/30706>

There are several components to the toll structure, but the most important factor in the magnitude and distribution of effects from the Project is the toll rate. Overall, the Project would result in a congestion benefit both regionally and within the Manhattan CBD. On a local level, depending on the toll structure, near and adjacent to the Manhattan CBD there would be increases or decreases in traffic volumes as vehicles divert to other routes to avoid the toll. **Table ES-5** provides additional information regarding these effects and proposed mitigation. The following trends are important to understand:

- **1** All the tolling scenarios would reduce traffic entering the Manhattan CBD.
- All the tolling scenarios would have an overall net benefit in congestion reduction for the region.
- Adding discounts, crossing credits, and exemptions would require that the overall toll rates increase, leading to more congestion reduction.
- Higher toll rates would reduce traffic, and increase transit ridership entering the Manhattan CBD.
- **2** Higher toll rates would increase traffic diversions as drivers avoid the toll. This would lead to less traffic in the Manhattan CBD, and changes in traffic patterns outside of the CBD, with both increases and decreases of traffic in localized locations elsewhere.
- Crossing credits, which would credit some of the amount drivers pay for TBTA or PANYNJ tolls against the CBD toll, would bring the total costs of different routes into the CBD closer to parity and therefore change the degree to which, and balance of where, traffic reductions occur.
 - ❖ Tolling scenarios with crossing credits would have less effect on reducing traffic entering the Manhattan CBD from Queens, and much less effect on reducing traffic entering from New Jersey than tolling scenarios without crossing credits. Tolling scenarios with crossing credits would lead to greater decreases in traffic entering from north of 60th Street and Brooklyn.
 - ❖ **3** Crossing credits would encourage some drivers to shift from the currently-free East River Bridges to TBTA's tolled tunnels. As a result, traffic would increase at the Queens-Midtown Tunnel and the Hugh L. Carey Tunnel, resulting in more traffic on the Long Island Expressway and a shift of traffic along the Gowanus Expressway from the BQE to the Hugh Carey Tunnel, as well as increases in traffic on the local streets in Manhattan that feed traffic to and from these tunnels.

In addition to the toll rate and crossing credits, several other factors play a role in generating beneficial and adverse effects.


Truck toll price **4** Unlike cars, trucks cannot shift to a different mode (e.g., transit). For trucks traveling through the CBD en route to their final destination, their only alternative to paying the toll is to not make the trip or divert around the Manhattan CBD. Similar to the general traffic, increased tolls decrease truck traffic entering the Manhattan CBD. Truck diversion increases with increases in the toll (similar to general traffic). In particular, trucks would divert to routes on highways in Staten Island and in the South Bronx.

Time of day. Reducing the toll in the overnight period would reduce diversions to alternative routes, lessening effects outside the Manhattan CBD and encouraging delivery vehicles to shift to the less-congested overnight

Public Outreach Response


In response to concerns raised during the early Public Outreach related to increased truck traffic on the Cross Bronx Expressway and the fact that trucks do not have an alternate mode of travel to avoid the toll, Scenario G was added. This scenario charges the same toll rate for cars and trucks and significantly reduces truck diversions in the South Bronx and Staten Island. See **Chapter 4A, "Regional Transportation Effects and Modeling."**

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This statement implicitly states that traffic would increase outside the CBD, such as in BPC or FiDi area. This plan shifts congestion from some areas to others. Due to the current CBD and exempted thoroughfares, traffic will shift to lower Manhattan, specifically FiDi and BPC.

Further, not all "traffic" is created equally. A passenger vehicle destined for a parking garage will maintain a higher speed of travel than a construction materials delivery truck or a package delivery truck.

 Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 6:42:27 AM

The toll proposed is already very high and will result in avoidance as-proposed within the CBD. This will flood smaller streets, with lower travel speeds, around the tolling enforcement points and result in back-pressure that will congest the entire area. We suggest the impact around the CBD be further reviewed.

 Number: 3 Author: BPC Resident Subject: Highlight Date: 6/12/23, 6:44:16 AM

The impact on BPC and along West St needs to be further reviewed in this study.

 Number: 4 Author: BPC Resident Subject: Highlight Date: 6/12/23, 6:44:16 AM

The assumptions underpinning this section may not be entirely accurate. Consumers of products and services within the CBD will still exert the same demand and the costs of the tolling will be passed down to them. Some of the delivery companies may add a special delivery fee for customers within the CBD.

mitigation measures will be implemented by the Project Sponsors]. Each respective chapter provides additional description and discussion.

Figure ES-4. Resource Areas and Effects Assessed in the EA

Areas with Only Beneficial or No Adverse Effects	1 Areas with Potential Adverse Effects
Transportation: Regional Transportation Transportation: Parking Social Conditions: Population Social Conditions: Neighborhood Character Social Conditions: Public Policy Economic Conditions Energy Parks and Recreational Resources Historic and Cultural Resources Visual Resources Air Quality Energy Noise Natural Resources Hazardous Waste/Contaminated Materials 2 Construction Effects	Transportation: Highways and Intersections Transportation: Transit Transportation: Pedestrians and Bicycles Environmental Justice

What are the effects of the Project on environmental justice populations?


Some of the Project effects occur in certain locations, so attention was given to whether these effects occurred broadly across the region or population, or whether they affect communities or populations of those who are low-income or historically underrepresented (environmental justice communities or populations). The following paragraphs provide additional explanation about related beneficial or adverse effects.


Reduced traffic would benefit all drivers traveling to and near the Manhattan CBD, including environmental justice populations, by improving travel times, reducing vehicle operating costs, and improving safety. ***[Investments in transit would also benefit environmental justice populations who use MTA's subways and buses to access work, school, medical care, and more.]*** The Project would improve regional air quality, and most environmental justice populations who live in the Manhattan CBD would experience lower localized pollutant emissions due to reduced traffic. Additional benefits are described in **Chapter 17, “Environmental Justice.”**

Low-income drivers

The cost of the new CBD toll would not be predominantly borne by low-income drivers. However, for low-income drivers who have no ***[reasonable]*** alternative to reach the Manhattan CBD other than private vehicle, the effect of that cost would be more burdensome because the cost of the toll would consume a larger percentage of their available income. ***[As such, the EA as published in August 2022 found that a disproportionately high and adverse effect would potentially occur for low-income drivers to the Manhattan CBD who do not have a reasonable alternative transportation mode for reaching the Manhattan CBD. This is particularly relevant for low-income frequent drivers to the Manhattan CBD.]***²¹ In addition to the mitigation previously offered, which will reduce barriers to benefiting from lower E-ZPass toll rates (compared to Tolls by Mail) and existing toll discounts available to certain

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Need to review residents of the CBD that are being tolled to leave their homes to access services.

 Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 6:50:56 AM
The analysis needs to review the effects on construction where there will be more construction equipment left overnight, road-side, blocking CBD streets.

Taxis and FHV

Tolling scenarios **[B, C, E, and F]** include exemptions or discounts (in the form of caps) on the number of trips that can be charged for taxis and/or FHVs. Exemptions and caps decrease the toll burden on taxi/FHV drivers, while increasing the toll rate for other drivers to meet the Project's congestion and revenue objectives. ¹ taxis and FHVs are charged for each trip **[as in Tolling Scenarios A, D, and G]**, the demand for their service would decline, particularly in New York City, reducing trips and better meeting the Project objectives, but creating new direct costs and/or potential job insecurity. **Table ES-[5]** provides information on the magnitude of these effects. Because many New York City taxi and FHV drivers identify as part of an environmental justice population, this would result in **[potential]** disproportionately high and adverse effects **[without mitigation]**.

[The EA released in August 2022 proposed several mitigation measures to address potential job insecurity. However, as a result of input during the public comment period, in this Final EA, new mitigation is proposed in place of those measures. Specifically, TBTA will ensure that these vehicles are not tolled more than once per day. With the addition of this new mitigation commitment, the Project will not result in a disproportionately high and adverse effect on taxi and FHV drivers in New York City.²⁴]

[To ensure that the Project does not result in a potential disproportionately high and adverse effect on New York City taxi and FHV drivers, TBTA will institute the following mitigation.

MITIGATION

² BTA will ensure that New York City taxis and FHVs are not tolled more than once per day in the adopted CBD toll structure.*]

[* Subchapter 4A describes the potential adverse effects and also provides additional narrative regarding what would occur in Tolling Scenarios A, D, and G if these vehicles were to be capped at once per day or exempted from the CBD toll. In each case, the potential effects fall within the range of effects explored through the tolling scenarios in the EA. Further, on page ES-24 of this Executive Summary, there is additional discussion regarding the range of effects, with specific attention to how the mitigation measures could change the effects of the Project. As explained, additional analysis conducted demonstrates that the results from these mitigation measures will still be within the range of effects explored in the EA. Finally, for discussion related to how this mitigation affects the analyses for each chapter, see Chapter 3, "Environmental Assessment Framework," Section 3.3.3.]

[Traffic changes in environmental justice communities

As a result of traffic diversions as drivers seek to avoid the new toll, some environmental justice communities would experience lower traffic volumes; others would see increases in traffic. Following publication of the EA in August 2022, and based on public comments and input from the Environmental Justice Technical Advisory Group, the Project Sponsors conducted additional analysis related to these potential diversions. For the entire analysis, refer to Appendix 17D, "Technical Memorandum;" the following paragraphs provide a high-level summary of findings and conclusions.

Air pollutants associated with traffic and truck traffic. Appendix 17D, "Technical Memorandum" describes how and why traffic, and particularly truck traffic, contributes to pollutant burdens and the association between these burdens and health outcomes. Specifically, vehicles contribute to air pollutants like carbon monoxide, mobile source air toxics, nitrogen oxides, and particulate matter through brake and tire particulates, dispersal of roadway dust, and through the burning of fossil fuels in combustion engines.²⁵

Although all motor vehicles produce air pollutants, emissions from trucks are of particular concern to near-road air quality, in part because of the pollutants they emit, but also because they disproportionately contribute more emissions than other types of vehicles.²⁶

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This doesn't jive with current practice, FHV's are already passing a \$2.75 congestion charge per ride to consumers since 2019.



Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 8:26:18 AM

Per the prior comment, this does not make any sense as FHV's are already charging per ride \$2.75. The current congestion charge would be in addition to the per trip congestion charge already implemented. Please analyze the impact of this and whether it is fair to have a double charge.

[Table ES-4. Regional and Place-Based Mitigation Measures]¹

MITIGATION MEASURES	BENEFIT AND RESULT OF MITIGATION	5-YEAR FUND-ING	RELEVANT LOCATION(S)	FUNDING SOURCE	IMPLEMEN-TATION LEAD
Regional Mitigation					
Further reduced overnight toll	Minimize/avoid truck diversions	\$30 million	10-county environmental justice study area	CBD Tolling Program	TBTA
Expand NYC Clean Trucks Program	NOx and PM _{2.5} reductions from ~500 new clean trucks	\$20 million		CBD Tolling Program	NYCDOT
Expand NYCDOT Off-Hours Delivery Program	Safety and emissions reduction benefits resulting from reduced truck traffic during the day	\$5 million		CBD Tolling Program	NYCDOT
Place-Based Mitigation					
Toll vehicles traveling northbound on the FDR Drive that exit at East Houston Street and then travel southbound on FDR Drive	25 to 35 percent of the non-truck traffic increases on the FDR Drive could be mitigated	N/A	FDR Drive between the Brooklyn Bridge and East Houston Street	N/A	TBTA
Replacement of Transport Refrigeration Units (TRUs) at Hunts Point Produce Market	Major NOx and PM _{2.5} reductions from the replacement of up to 1,000 TRUs	\$15 million ²	Hunts Point	MTA CMAQ Program	NYCDOT
Implement Electric Truck Charging Infrastructure	NOx and PM _{2.5} reductions from electric vehicles using 35 new chargers (at seven stations)	\$20 million	After toll rates are set, a process that includes both additional analyses and community input will take place to determine specific locations	\$10 million Federal CRP + \$10 million CBD Tolling Program	NYSDOT
Install Roadside Vegetation to Improve Near-Road Air Quality	Improves near-road air quality by pollutant capture from ~4,000 trees and ~40,000 shrubs	\$10 million		CBD Tolling Program	TBTA with Relevant State and Local Agencies
Renovate Parks and Greenspace in Environmental Justice Communities	Increases overall community well-being. 2-5 park/greenspace renovations depending on size and complexity.	\$25 million		CBD Tolling Program	TBTA with Relevant State and Local Agencies
Install Air Filtration Units in Schools Near Highways	¹ Removes air pollutants from classrooms. 25-40 schools depending on school size and complexity of existing HVAC system.	\$10 million		CBD Tolling Program	TBTA with Relevant State and Local Agencies
Establish Asthma Case Management Program and Bronx Center	Reduces hospitalizations and doctor visits, decreases days and nights with symptoms and missed school days – program expansion up to 25 schools	\$20 million		CBD Tolling Program	NYC DOHMH

¹ An additional \$5 million has been allocated for mitigation and enhancement measures related to monitoring across other topics, along with \$47.5 million for the low-income toll discount discussed above. Enhancement measures include air quality monitoring that will expand NYC's existing monitoring network. Locations will be selected in consideration of the traffic and air quality analyses in the EA and in coordination with environmental justice stakeholders and relevant state and local agencies. This will complement the regional and place-based mitigation measures related to traffic diversions outlined in Table ES-5 (see **Chapter 10, "Air Quality,"** for details).

² After three years, any remaining funds designated for TRU replacements may also be used for clean truck replacement vouchers through the NYC Clean Trucks Program.

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Battery Park City Schools along West Street and Hugh L Carey Tunnel were not considered. We are requesting further environmental studies to ensure the health and safety of the students from 0-12 Grade.

Process for final siting of mitigation measures. Of the seven place-based mitigation measures identified, five are flexible in where they can be implemented, while the tolling of movements into the Manhattan CBD at East Houston Street and the replacement of transport refrigeration units (TRUs) at Hunts Point Produce Market are specific to those particular locations.

1 After the actual toll rates are adopted, a process that includes both additional analyses and community input will take place to determine the sites of the other five place-based mitigation measures (e.g., in which schools to install air filtration units, or on what roadways to plant vegetation). This will require coordination between the Project Sponsors, the Environmental Justice Community Group (representing the 10-county environmental justice study area, and as described further in Table ES-6), the relevant communities receiving the place-based mitigation, and local implementing agencies, and will include needs assessments and feasibility screening to determine the range of possibilities.

The Project Sponsors will work with the appropriate implementing agencies through existing public engagement and participation processes to then prioritize and select the specific locations. The specific place-based mitigation sites will be made available to the public through the Project website, as well as direct emails to members of the public who have signed up to receive information about the Project.

The specific feasibility factors and forms of engagement vary by mitigation and include:

- **Electric Truck Charging Infrastructure:** This mitigation will be implemented through the Federal Carbon Reduction Program (CRP) using funds received by NYSDOT and will therefore be limited to locations in New York. Siting considerations will include potential visual impacts, proximity to highways (to minimize travel on local roads), and the study of potential traffic and noise impacts. The NYMTC Clean Freight Corridors Study – a study developed by the metropolitan planning organization in consultation with motor carriers, utility companies, fuel infrastructure manufacturers/suppliers, truck stop operators, industrial real estate companies, and community and advocacy organizations – will be used to help identify priority locations. Such groups will be re-engaged, as warranted, along with state and local officials, to provide feedback in the course of identifying appropriate locations.
- **2** **Roadside Vegetation to Improve Near-Road Air Quality:** The Project Sponsors will work with relevant local and state agencies to assess the availability of roadside space and the presence of existing plantings, as well as access and maintenance considerations, to identify appropriate sites near sensitive receptors (e.g., schools, day care, senior or community centers, or outdoor recreational facilities) as locations for new plantings. To align with community priorities, the Project Sponsors will engage with community stakeholders, elected officials, and the Environmental Justice Community Group.
- **Parks and Greenspace in Environmental Justice Communities:** The Project Sponsors will work with relevant state and local agencies to assess potential locations for park and greenspace investments in the affected communities, including in existing parkland where the expansion of green space, tree planting, or other upgrades is feasible. The agencies will solicit input on prioritization of locations and treatments from the Environmental Justice Community Group, local officials, and other community stakeholders.
- **Air Filtration Units in Schools Near Highways:** The Project Sponsors will work with relevant school authorities to assess needs and analyze feasibility of upgrading existing filtration systems in schools in census tracts within 300 meters of highways where truck traffic is projected to increase. Factors will include the design and

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Battery Park City Schools along West Street and Hugh L Carey Tunnel were not considered. We are requesting further environmental studies to ensure the health and safety of the students from 0-12 Grade.



Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 6:58:49 AM

This language appears to reinforce the need for an environmental impact study. Our children's health should be prioritized and not be made second to reducing congestion in the CBD. We urge for an environmental impact study to be conducted ASAP.

¹Performance of existing HVAC systems, the facility's proximity to highways, and the area asthma rates, as well as scheduled capital projects. The Project Sponsors will work with relevant state and local agencies and solicit input from community stakeholders to determine locations where air filtration upgrades will be most impactful.

- **Asthma Case Management Program and Center:** This mitigation will expand on the success of existing city programs operating within the five New York City counties.
 - ❖ **Asthma Case Management Program – NYC Department of Health and Mental Hygiene (DOHMH)** will conduct a needs assessment to identify schools in affected census tracts with existing high rates of asthma. Additionally, NYC DOHMH will engage with school leadership on expansion of the Asthma Care Management Program and will solicit input from the Environmental Justice Community Group, parents, and other community stakeholders on priority locations that should be prioritized and how to best reach families of children with asthma.
 - ❖ **Asthma Center – Selection of a location in the Bronx** will include consideration of asthma rates, population concentration, proximity to sensitive receptors, the location of existing facilities and services, accessibility via public transportation, and availability of suitable space. NYC DOHMH will work with community stakeholders to solicit input on programming and outreach strategies to ensure that the center maximizes its benefit to people with asthma.

Will the mitigation measures change the results of the EA?

The short answer is no, the mitigation measures neither require a change in the tolling scenarios used for the analyses in the EA, nor change the fundamental conclusions of the EA. In the Final EA, the Project Sponsors commit to a number of mitigation measures that affect the tolling structure and/or the cost of the CBD Tolling Program. These include: 1) a further reduced overnight toll for trucks and other vehicles; 2) tolls of no more than once per day for taxis and FHV's; 3) mitigation measures to address potential increased traffic volumes in certain environmental justice communities as a result of Project-related traffic diversions; and 4) a discounted toll rate for frequent low-income drivers for the first five years of the Project.

While some of the tolling scenarios analyzed in the EA reflect this treatment of taxis and FHV's (Tolling Scenarios B, F, and modified scenarios A, D, and G), none include the further reduced overnight toll or the low-income discounted toll rate. Thus, additional analysis was conducted to ensure that with these mitigation measures included, the potential Project effects would still fall within the range of effects modeled for the EA.

To analyze the other mitigation measures' effects, a tolling scenario was developed using modified Scenario B1 as the basis (a version of Scenario B that meets the revenue target, as described in Appendix 2E, page 2E-2; and Appendix 4A, page 4A.2-1). This tolling scenario includes a cap on tolls for taxis and FHV's of once per day and an entirely free period from 12:00 a.m. to 6:00 a.m. for all vehicles, including trucks. For this analysis, the time range and toll rate reduction for the further reduced overnight mitigation were expanded beyond the commitments in the Final EA (tolls that are at or below 50 percent of the peak toll rate from at least 12:00 a.m. to 4:00 a.m.) to capture any differences in effects from the tolling scenarios used in the EA. This modified scenario – referred to as B2 in the following text – demonstrates that the mitigation measures described in the Final EA could be incorporated into the CBD Tolling Program, with the potential effects still falling within the range of effects explored through the current tolling scenarios. Specifically:

1. **VTM and volume reduction objectives of the Project.** Tolling Scenario B2 results in a VMT reduction of 8.4 percent and a 17 percent reduction in vehicles entering the

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This language appears to reinforce the need for an environmental impact study. Our children's health should be prioritized and not be made second to reducing congestion in the CBD. We urge for an environmental impact study to be conducted ASAP.

Central Business District (CBD) Tolling Program Environmental Assessment – Executive Summary

EA CHAPTER / ENVIRONMENTAL CATEGORY	TOPIC	SUMMARY OF EFFECTS	LOCATION	DATA SHOWN IN TABLE	TOLLING SCENARIO							POTENTIAL ADVERSE EFFECT	MITIGATION AND ENHANCEMENTS
					A	B	C	D	E	F	G		
5A – Social Conditions: Population (Cont'd)	Indirect Displacement	1 Notable changes in socioeconomic conditions or cost of living so as to induce potential involuntary displacement of residents	Manhattan CBD	Narrative	The Project would not result in the potential for indirect (involuntary) residential displacement. It would not result in substantial changes to market conditions so as to lead to changes in housing prices, given that real estate values in the Manhattan CBD are already high and the many factors that affect each household's decisions about where to live. In addition, low-income residents of the CBD would not experience a notable increase in the cost of living as a result of the Project because of the lack of change in housing costs, the many housing units protected through New York's rent-control, rent-stabilization, and other similar programs, the tax credit available to CBD residents with incomes of up to \$60,000, and the conclusion that the cost of goods would not increase as a result of the Project (see "Economic Conditions" below).							No	No mitigation needed. No adverse effects
	Community Facilities and Services	Increased cost for community facilities and service providers in the Manhattan CBD, their employees who drive, and clientele who drive from outside the CBD	Manhattan CBD	Narrative	The Project would increase costs for community service providers that operate vehicles into and out of the Manhattan CBD and for people who travel by vehicle to community facilities and services in the Manhattan CBD, as well as residents of the CBD and employees of community facilities who use vehicles to travel to community facilities outside the CBD. Given the wide range of travel options other than driving, the cost for users to drive to community facilities and services would not constitute an adverse effect on community facilities and services.							No	No mitigation needed. No adverse effects
	Effects on Vulnerable Social Groups	Benefits to vulnerable social groups from new funding for MTA Capital Program	28-county study area	Narrative	The Project would benefit certain vulnerable social groups, including elderly populations, persons with disabilities, transit-dependent populations, and non-driver populations by creating a funding source for the MTA 2020-2024 Capital Program (and subsequent capital programs and by reducing congestion in the Manhattan CBD). Elderly individuals would benefit from the travel-time and reliability improvements to bus service with the CBD Tolling Alternative, as bus passengers tend to be older than riders on other forms of transit, such as the subway and, as described above, bus passengers in the Manhattan CBD would benefit from travel-time savings due to the decrease in congestion. People over the age of 65 with a qualifying disability receive a reduced fare on MTA subways and buses, and elderly individuals with a qualifying disability can also receive MTA's paratransit service, including taxis and FHV's operating on behalf of MTA to transport paratransit users. Elderly people with disabilities and low-income individuals who drive to the Manhattan CBD would be entitled to the same mitigation and enhancements proposed for low-income and disabled populations, in general. Other elderly individuals who drive to the Manhattan CBD would pay the toll.							No	No mitigation needed. No adverse effects
	Access to Employment	Increased cost for small number of people who drive to work	28-county study area	Narrative	Decrease in work trips by driving modes to and within the Manhattan CBD, with an offsetting increase in transit ridership. Those who drive despite the CBD toll would do so based on the need or convenience of driving and would benefit from the reduced congestion in the Manhattan CBD. Negligible effect (less than 0.1%) on travel to employment within the Manhattan CBD and reverse-commuting from the CBD due to the wide range of transit options available and the small number of commuters who drive today.							No	No mitigation needed. No adverse effects
5B – Social Conditions: Neighborhood Character	No notable change in neighborhood character		Manhattan CBD	Narrative	The changes in traffic patterns on local streets are unlikely to change the defining elements of the neighborhood character of the Manhattan CBD.							No	No mitigation needed. No adverse effects
			Area near 60th Street Manhattan CBD boundary	Narrative	Changes in parking demand near the 60th Street CBD boundary (including increases just north of 60th Street and decreases just to the south) would not create a climate of disinvestment that could lead to adverse effects on neighborhood character nor alter the defining elements of the neighborhood character of this area.							No	No mitigation needed. No adverse effects
5C – Social Conditions: Public Policy	No effect		28-county study area	Narrative	The Project would be consistent with regional transportation plans and other public policies in place for the regional study area and the Manhattan CBD.							No	No mitigation needed. No adverse effects

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This is a misrepresentation of the demographic. There are many people in the CBD, and especially BPC, that have recently experienced rent hikes of over 15% this year. An additional ~\$5k for residents is not affordable.

EA CHAPTER – TOPIC	RELEVANT LOCATION(S)	DESCRIPTION OF MITIGATION OR ENHANCEMENT	TIMELINE FOR PRE- AND POST-PROJECT IMPLEMENTATION DATA COLLECTION FOR SPECIFIC MEASURES	THRESHOLD FOR DETERMINING WHEN NEXT STEP(S) WILL BE IMPLEMENTED	TIMING FOR SPECIFIC MEASURES	LEAD AGENCY
17 – Environmental Justice – Traffic diversion to certain communities already overburdened by pre-existing air pollution and chronic diseases (See Note 1)	Multiple throughout the environmental justice study area	New in Final EA: TBTA will ensure the overnight toll for trucks and other vehicles is reduced to at or below 50 percent of the peak toll from at least 12:00 a.m. to 4:00 a.m. in the final structure; this will reduce truck diversions.	N/A – No early monitoring required; implemented under any adopted tolling structure.	N/A – No threshold required; implemented under any adopted tolling structure.	Concurrent with Project implementation.	TBTA will lead.
		New in Final EA: NYCDOT will expand NYC Clean Trucks Program to accelerate the replacement of eligible old diesel trucks, which travel on highways in certain environmental justice communities where the Project is projected to increase truck traffic, to lower-emission electric, hybrid, compressed natural gas, and clean diesel vehicles.	N/A – No early monitoring required; implemented under any adopted tolling structure.	N/A – No threshold required; implemented under any adopted tolling structure.	Engagement with truck-owning companies will start after toll rates are set; implementation will begin within six months of start of tolling operations.	NYCDOT will lead.
		New in Final EA: NYCDOT will expand its off-hours deliveries program in locations where the Project is projected to increase truck traffic to reduce daytime truck traffic and increase roadway safety in certain environmental justice communities.	N/A – No early monitoring required; implemented under any adopted tolling structure.	N/A – No threshold required; implemented under any adopted tolling structure.	Engagement with shippers and receivers will start after the toll rates are set; implementation will begin within six months of start of tolling operations.	NYCDOT will lead.
	FDR Drive between the Brooklyn Bridge and East Houston Street	New in Final EA: TBTA will toll vehicles traveling northbound on the FDR Drive that exit at East Houston Street and then turn to immediately travel south on FDR Drive; this will mitigate modeled non-truck traffic increases on the FDR Drive between the Brooklyn Bridge and East Houston Street.	N/A – No early monitoring required; implemented under any adopted tolling structure.	N/A – No threshold required; implemented under any adopted tolling structure.	Concurrent with Project implementation.	TBTA will lead.
	Hunts Point Produce Market	New in Final EA: The Project Sponsors will coordinate to replace diesel-burning TRUs with cleaner vehicles at the Hunts Point Produce Market.	N/A – No early monitoring required; implemented under any adopted tolling structure.	N/A – No threshold required; implemented under any adopted tolling structure.	Engagement with TRU owners and lessees for TRU replacement will start immediately after receiving Project approval.	NYCDOT will lead.
	The specific census tracts that would experience increased or decreased truck traffic change slightly depending on the tolling scenario. The following communities could have census tracts that merit place-based mitigation: High Bridge, Morrisania and Crotona, Tremont, Hunts Point, Mott Haven, Pelham, Throgs Neck, Northeast Bronx, East Harlem, Randall's Island, Downtown Brooklyn, Fort Greene, South Williamsburg, Orange, East Orange, Newark, and Fort Lee. (See Note 2).	New in Final EA: NYSDOT will coordinate to expand electric truck charging infrastructure.	After toll rates are set, analyses of the adopted toll structure will be undertaken as outlined in Appendix 17D to determine where truck diversions are expected to occur. With this analysis and through continued engagement with the Environmental Justice Community Group and other stakeholders, specific locations for place-based mitigation will be determined. Data on the scope and impact of mitigation measures implemented will be collected in an ongoing manner.	N/A – No threshold required; implemented under any adopted tolling structure.	Specific locations will be determined after toll rates are set; implementation will begin within six months of start of tolling operations.	NYSDOT will lead.
		New in Final EA: The Project Sponsors will coordinate to install roadside vegetation to improve near-road air quality.			Specific locations will be determined with the affected communities after toll rates are set; implementation will begin within six months of start of tolling operations.	The Project Sponsors will coordinate with relevant state and local agencies.
		New in Final EA: The Project Sponsors will renovate parks and greenspaces.			Specific locations will be determined with the affected communities after toll rates are set; implementation timing will be determined after locations are confirmed.	The Project Sponsors will coordinate with relevant local agencies.
		New in Final EA: The Project Sponsors will install or upgrade air filtration units in schools.			After the toll rates are set, a site/needs assessment will take place prior to start of tolling operations; implementation timing will be determined after locations are confirmed.	The Project Sponsors will coordinate with relevant local agencies.
		New in Final EA: The Project Sponsors will work with NYC DOHMH to expand their asthma case management program and create new community-based asthma programming through a neighborhood asthma center in the Bronx.			After the toll rates are set, a site/needs assessment will take place prior to start of tolling operations; implementation timing will be determined after locations are confirmed.	The Project Sponsors will coordinate with NYC DOHMH.

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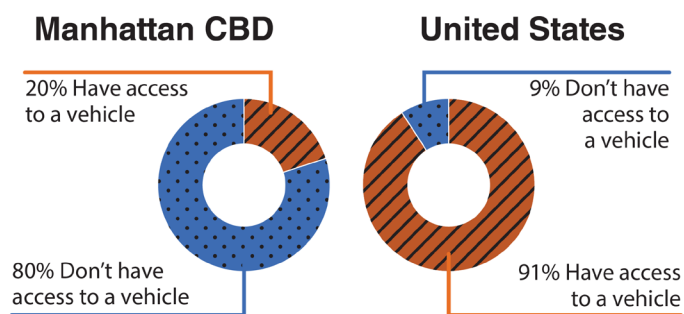
Battery Park City Schools along West Street and Hugh L Carey Tunnel were not considered. We are requesting further environmental studies to ensure the health and safety of the students from 0-12 Grade.

1.2.3 Traveling within the Manhattan CBD

The Manhattan CBD has a long development history, beginning before the advent of the automobile and rapidly expanding before the predominance of the automobile. Thus, options other than private automobiles are available to travel around the Manhattan CBD. As noted previously, numerous subway and bus routes serve the Manhattan CBD, and there is a network of bicycle lanes and a widely available bicycle-share program. The Manhattan CBD is very walkable with sidewalks on both sides of most streets, with mostly signalized intersections that have crosswalks and pedestrian signals, and with many destinations near each other that are easily accessible by foot.

Because most businesses do not offer on-site, free parking and it can be difficult to find curbside parking, driving within the Manhattan CBD is not typical except for commercial deliveries. Indeed, 80 percent of Manhattan CBD residents do not own or have ready access to a vehicle (**Figure 1-4**).¹⁷ Taxis and for-hire vehicles (FHVs) provide point-to-point service within the Manhattan CBD and are convenient for trips that would otherwise involve multiple transit routes and modes or a long walk (e.g., crosstown trips between the east and west sides of Manhattan).¹⁸ However, trips by taxi or FHVs (a category that includes taxis and app-based services) may be costly. **Therefore, many people use the subway, buses, or bicycles to make their longer local trips within the Manhattan CBD.** Walking is the typical choice for shorter trips or even longer trips that would otherwise involve multiple transit modes or transfers.

Figure 1-4. Vehicle Access (Manhattan CBD compared to United States)



Sources: Census Transportation Planning Package, American Community Survey 2012-2016

1.2.4 Commuting to the Manhattan CBD

According to 2012–2016 Census Transportation Planning Package (CTPP) data, nearly 10.7 million people have their place of employment in the regional study area. While the Manhattan CBD is the traditional economic hub of the region, many residents of the region do not work in or regularly travel to the Manhattan CBD. In total, approximately 1.5 million people work in the Manhattan CBD, and approximately 1,262,400 of those workers commute to the Manhattan CBD from outside the CBD. Approximately 65 percent of those commuters are from New York City, 8 percent are from Long Island, 7 percent are from

¹⁷ These data are from the CTPP data product based on the 2012–2016 American Community Survey. The CTPP provides custom tables describing residence, workplace, and trips from home to work. The U.S. Census Bureau has not updated the CTPP to reflect more recent American Community Survey data.

¹⁸ While taxis are sometimes considered a type of for-hire vehicle, for the purposes of this EA, they are treated separately.

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This figures should be adjusted for families with children.



Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 7:14:35 AM

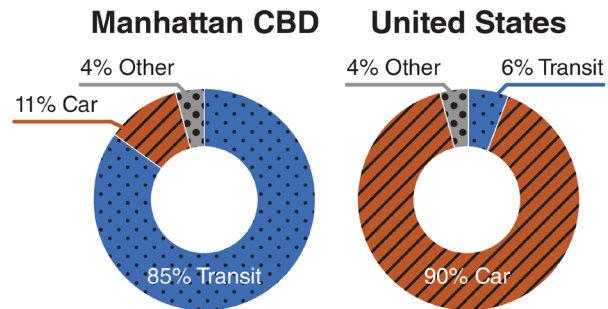
There are families that are not able to use these transportation modes. This should be more clear on the reference to "many people".

Chapter 1, Introduction

New York counties north of New York City, 18 percent are from New Jersey, and 2 percent are from Connecticut (see **Figure 1-6** on the following page).

According to 2012–2016 CTPP data, 85 percent of workers who commute to the Manhattan CBD take public transportation to travel to work and 11 percent (approximately 142,500 workers) drive to work. The remaining 4 percent travel by bicycle, walking, motorcycle, and taxi and FHV. This level of commuting by public transportation is much higher than in the United States overall, where most people commute to work by car (**Figure 1-5**).

Figure 1-5. Travel Modes to Work (Manhattan CBD compared to United States)



Sources: Census Transportation Planning Package, American Community Survey 2012-2016

1.3 PROJECT PURPOSE

The Project purpose is to reduce traffic congestion in the Manhattan CBD in a manner that will generate revenue for future transportation improvements, pursuant to acceptance into FHWA's VPPP.

1.4 PROJECT NEEDS

1.4.1 The Need to Reduce Vehicle Congestion in the Manhattan CBD

The Manhattan CBD is the commercial center of a 28-county region that surrounds and includes New York City. Within nine square miles, the Manhattan CBD houses 1.5 million jobs, 450 million square feet of office space, and more than 617,000 residents.^{19, 20, 21} It is also a regional and national destination for commerce, entertainment, and tourism, and the economic hub of the New York City region. The New York City region's population has grown by 5 percent since 2000 and is expected to continue to grow, with the population projected to exceed 25 million by 2045. New York City's population is projected to surpass 9 million by 2045.²²

¹⁹ U.S. Census Bureau, 2012–2016 Census Transportation Planning Package.

²⁰ New York State Comptroller. 2017. New York City's Office Market report.

²¹ U.S. Census Bureau. American Community Survey, 2015–2019 Estimates.

²² New York Metropolitan Transportation Council (NYMTC). 2015. 2050 Socioeconomic and Demographic Forecasts. <https://www.nymtc.org/DATA-AND-MODELING/SED-Forecasts/2050-Forecasts>.

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The analysis should take into account post-COVID data. This seems to be outdated data. Please review.

Chapter 1, Introduction

The growth in New York City's population and employment, particularly within the Manhattan CBD, has increased traffic congestion and delays, slowing travel and jeopardizing the vitality of the area. A 2018 study by the Partnership for New York City (a local business group) stated that "traffic congestion will be a \$100 billion drag on the New York metro area economy over the next five years." It cited the Manhattan CBD as the primary source of traffic congestion in the region and reported that excess congestion had increased by 53 percent since it began studying the issue in 2006.²³

² This congestion makes travel a challenge as well. NYCDOT's *New York City Mobility Report* found that the Manhattan CBD had the highest concentration of slow-moving buses in the entire city during the average weekday PM peak period (4 p.m. to 6 p.m.), with speeds between 5 mph and 6 mph.²⁴ This is substantially slower than the average citywide bus speed of 7.58 mph.²⁵

According to FHWA, "congestion usually relates to an excess of vehicles on a portion of roadway at a particular time resulting in speeds that are slower—sometimes much slower—than normal or 'free-flow' speeds. Congestion often means stopped or stop-and-go traffic."²⁶ FHWA identifies several typical causes of traffic congestion: physical bottlenecks; construction work zones; traffic incidents, such as crashes and disabled vehicles; inclement weather; special events that create a surge in traffic or create detours; day-to-day variability in traffic flows; and insufficient intersection capacity, sometimes related to nonoptimized traffic signals. Of these, FHWA cites bottlenecks as the greatest source of congestion.²⁷ Given that Manhattan is an island, with limited opportunity to increase the roadway capacity within or leading to and from it, the principal means to address congestion caused by bottlenecks is to reduce demand or the number of vehicles that drive into and out of Manhattan.

Congestion by the Numbers

Cost of Congestion: 102 hours of lost time; nearly \$1,595 per year per driver in the New York City region.*

¹ **Travel Speeds:** Decreased **[23]** percent in the Manhattan CBD, from 9.1 miles per hour (mph) to 7.1 mph between 2010 and 2019.**

FHV Registrations: Tripled in New York City, from fewer than 40,000 to more than 120,000 between 2010 and 2019. Due to the effects of the COVID-19 pandemic and the city's continued cap on FHV registrations, the number of FHVs making trips fell to 70,000 by April 2022.†

Local Bus Speeds: Declined 28 percent in the Manhattan CBD since 2010. The average speed of Select Bus Service (New York City Transit's bus rapid transit service) routes in Manhattan are 19 percent slower than Select Bus Service routes in other boroughs.††

Sources

* INRIX 2021 Global Traffic Scorecard. <https://inrix.com/scorecard-city/?city=New%20York%20City%20NY&index=5>.

** NYCDOT. August 2019. *New York City Mobility Report*. <https://www1.nyc.gov/html/dot/downloads/pdf/mobility-report-print-2019.pdf>.

† New York City Taxi and Limousine Commission and NYCDOT. June 2019. *Improving Efficiency and Managing Growth in New York's For-Hire Vehicle Sector*; NYC TLC FHV trip data.

†† NYCDOT. August 2019. *New York City Mobility Report*. <https://www1.nyc.gov/html/dot/downloads/pdf/mobility-report-print-2019.pdf>; New York City Transit analysis.

²³ Partnership for New York City. January 2018. "\$100 Billion Cost of Traffic Congestion in Metro New York". <https://pfnyc.org/wp-content/uploads/2020/01/2018-01-Congestion-Pricing.pdf>.

²⁴ New York City Department of Transportation (NYCDOT). August 2019. *New York City Mobility Report*. <https://www1.nyc.gov/html/dot/downloads/pdf/mobility-report-print-2019.pdf>.

²⁵ Ibid.

²⁶ FHWA. 2020. *Traffic Congestion and Reliability: Trends and Advanced Strategies for Congestion Mitigation*. https://ops.fhwa.dot.gov/congestion_report/executive_summary.htm.

²⁷ Ibid.

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Please see prior comments on these statements on page 48.



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The density of stops and proximity to bridges and tunnels significantly contributes to the congestion. Such a lens should be added to such comments as to the cause of congestion in the CBD.

The Impact of the COVID-19 Pandemic

In March 2020, in response to the COVID-19 pandemic public health emergency, then New York State Governor Andrew Cuomo issued executive orders that required most nonessential businesses to close, suspended in-person instruction at public schools and universities, and required residents of New York State to remain home except for essential activities. The governors of New Jersey and Connecticut imposed similar restrictions and consequently, the volume of trips to the Manhattan CBD by all travel modes dropped precipitously.

By summer 2021, emergency restrictions were suspended or expired, and many businesses and attractions in the Manhattan CBD reopened. While many office workers continue to work remotely, others have returned to offices or work locations on part-time or full-time schedules.

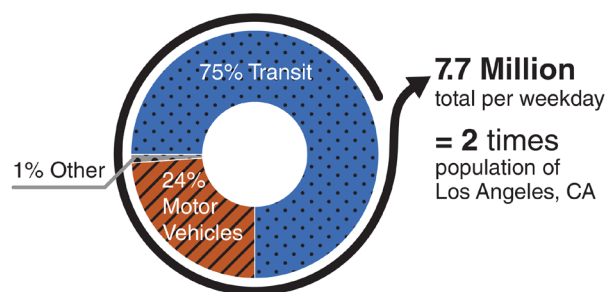
Weekday MTA subway, bus, and rail ridership remains roughly 35 to 45 percent lower than pre-COVID-19 pandemic levels. However, vehicle crossings at TBTA bridges and tunnels are only about 2 to 3 percent lower than in 2019. As activity is returning to pre-COVID-19 pandemic conditions, so is traffic congestion.

Source

Metropolitan Transportation Authority Day-by-Day Ridership Numbers. <https://new.mta.info/coronavirus/ridership>

The New York Metropolitan Transportation Council (NYMTC) prepares an annual report on commuting statistics into the Manhattan CBD, known as the *Hub Bound Travel Data Report*. The *Hub Bound Travel Data Report 2019* shows that approximately 7,665,000 people entered and exited the Manhattan CBD on an average weekday, which is about twice the population of Los Angeles, California (Figure 1-7).²⁸ Most (75 percent) of those people entered and exited via transit, but an estimated 1,856,000 (24 percent) people entered and exited by *[motor]* vehicle (auto, taxi, van, and truck). NYMTC notes that the daily vehicle trips increased in 2019 compared to 2018.²⁹ This translates to more vehicles entering and exiting the Manhattan CBD each day than the entire population of Phoenix, Arizona.³⁰

Figure 1-7. People Entering Manhattan *[and Exiting]* CBD (by mode)



Source: NYMTC Hub Bound Travel Data Report, 2019

The number of vehicles within the Manhattan CBD builds throughout the day and evening, peaking in the middle of the day and ending in the late-night hours. Between 6:00 a.m. and 10:00 a.m., approximately 40,000 or more private vehicles enter the Manhattan CBD each hour (Figure 1-8). ¹While some vehicles leave the Manhattan CBD during that time, they do not offset the accumulation of inbound vehicles. The

²⁸ As of July 1, 2021, the estimated population of Los Angeles was 3,849,297. U.S. Census Bureau. Quickfacts. <https://www.census.gov/quickfacts/fact/table/losangelesciticitycalifornia,losangelescountycalifornia,CA/PST045221>.

²⁹ NYMTC. January 2021. *Hub Bound Travel Data Report 2019*. Transit includes subway, commuter rail, bus, ferry, and tram. NYMTC relies on passenger, vehicle, and bicycle counts to prepare the hub bound data, and these counts include work and nonwork trips. Therefore, percentages of travel by mode vary from census data. https://www.nymtc.org/Portals/0/Pdf/Hub%20Bound/2019%20Hub%20Bound/DM_TDS_Hub_Bound_Travel_2019.pdf?ver=GS5smEoyHSsHsyX_t_Zriw%3d%3d.

³⁰ As of July 1, 2021, the estimated population of Phoenix was 1,624,589. U.S. Census Bureau. Quickfacts. <https://www.census.gov/quickfacts/phoenixcityarizona>.

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Study is missing on percentage that are in parking facilities.

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system, many others will ensure the long-term viability of current assets to address the deficiencies described previously.

MTA draws funding from several sources. MTA-controlled revenues include commuter rail, subway, and bus fares, and tolls at TBTA crossings; state and local subsidies that include dedicated state taxes (e.g., petroleum business taxes, sales tax, payroll mobility tax, motor vehicle registration and license fees, taxi and FHV fees, real estate transaction taxes on both residential and commercial properties); and station maintenance payments. The Federal government supports MTA transit and commuter capital projects through formula grants, full-funding grant agreements, and other funding programs, primarily through the Federal Transit Administration and the Federal Railroad Administration.

MTA uses these funds to make long-range capital improvements to the system's infrastructure, to expand the system, and to operate its integrated transportation network. However, there is a history of gaps in funding when economic conditions reduce the tax base; when the Federal, state, or local governments reduce subsidies; and when the cost of needed transit improvements exceeds the available funding.

Existing funding sources are insufficient to pay for the transit improvement and modernization projects identified in the MTA 2020–2024 Capital Program and subsequent capital programs that are needed for subway, bus, and commuter rail services. The New York State Legislature passed the MTA Reform and Traffic Mobility Act to provide stable and reliable funding to repair and revitalize the regional transit system.⁴⁶

1.5 PROJECT OBJECTIVES

FHWA and the Project Sponsors have established the following objectives to further refine the Project purpose and address the needs described above:

- **1. Reduce daily vehicle-miles traveled (VMT) within the Manhattan CBD.**
- Reduce the number of vehicles entering the Manhattan CBD daily.
- Create a funding source for capital improvements and generate sufficient annual net revenues to fund \$15 billion for capital projects for the MTA Capital Program.
- Establish a tolling program consistent with the purposes underlying the New York State legislation entitled the "MTA Reform and Traffic Mobility Act."⁴⁷

⁴⁶ Consolidated Laws of the State of New York, Vehicle and Traffic, Title 8, Article 44-C Sections 1701 through 1706.

⁴⁷ Refer to **Appendix 2B, "Project Alternatives: MTA Reform and Traffic Mobility Act."**

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This objective does not have a correlation with the proposed pricing scheme. If there was a correlation to miles traveled, then the pricing would be distance based and not turn of the clock based.

Table 2-1. Preliminary Alternatives Considered

TYPE OF ALTERNATIVE	ALTERNATIVE	DESCRIPTION
No Action Alternative Required by NEPA as the benchmark to which the build alternative(s) are compared	NA-1: No Action	The No Action Alternative would not implement a vehicular tolling program to reduce traffic congestion in the Manhattan CBD. The No Action Alternative would not meet the Project purpose and objectives; NEPA regulations require that it be evaluated and serve as the baseline condition against which the potential effects of the build alternative (i.e., the CBD Tolling Alternative) are evaluated. Under the No Action Alternative, existing policies and programs would continue, and planned transportation, policy, and development initiatives that are independent of the CBD Tolling Program would be implemented.
Non-Toll Pricing (NTP) Alternatives Alternatives that use types of pricing mechanisms other than tolling	NTP-1: Parking pricing strategies	This alternative would take one or more of several forms, including elimination of the resident exemption for the parking tax or raising of the tax, increased rates for metered on-street parking, and/or introduction of an overnight on-street parking fee.
Toll (T) Alternatives Alternatives that use different types of tolling mechanisms	T-1: Pricing on full roadways: Raise tolls or implement variable tolls on existing toll facilities	This alternative would raise tolls or implement variable tolls on existing toll facilities.
	T-2: Pricing on full roadways: Toll East and Harlem River bridges	This alternative would establish a toll on the currently untolled East River and Harlem River crossings to Manhattan.
	T-3: High-occupancy toll (HOT) lanes	This alternative would create HOT lanes for passenger cars on major crossings into Manhattan and highways leading to the Manhattan CBD.
	T-4: Zone-based pricing: CBD Tolling Program	This alternative would toll vehicles entering or remaining in the Manhattan CBD, south of and inclusive of 60th Street, excluding the West Side Highway/Route 9A and the Franklin D. Roosevelt (FDR) Drive.
Other (O) Alternatives Alternatives that use methods other than pricing or tolling to reduce congestion	11: Parking pricing: Reduce government-issued parking permits	This alternative would reduce the number of permits that provide free on-street parking for government employees commuting to jobs in Manhattan.
	O-2: Provide additional taxi stands to reduce cruising	This alternative would provide additional taxi stands and require that passengers be picked up at designated taxi stands.
	O-3: Create incentives for teleworking	This alternative would create incentives for teleworking to reduce the number of trips made to the Manhattan CBD.
	O-4: Ration license plates	This alternative would prohibit vehicles from entering the Manhattan CBD on certain days based on license plate number.
	O-5: Mandatory carpooling	This alternative would prohibit single-occupant vehicles from entering Manhattan south of 60th Street weekdays, 6 a.m. to 10 a.m.
	26: Truck time-of-day restrictions	This alternative would restrict trucks to overnight deliveries.

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The number of parking permits allowing for free parking contributes to the congestion. Did the analysis determine what the impact would be to reduce such permits on the congestion in the CBD?



Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 7:14:35 AM

This appears to be a viable approach. Did the analysis determine the impact of such a restriction on congestion, particularly as delivery trucks may add to congestion during the day time?

FHWA and the Project Sponsors used the Project purpose, need, and three of the four objectives presented in **Chapter 1, “Introduction,”** to conduct a screening evaluation of the preliminary alternatives, so as to establish a reasonable range of alternatives for further study, consistent with NEPA requirements. Given the importance of congestion reduction, the first two objectives relate to the need to reduce congestion while the third objective ties to creating a funding source for capital improvements. Together, the objectives used for screening were as follows:

- **1** Objective 1: Reduce daily vehicle-miles traveled (VMT) within the Manhattan CBD.
- **2** Objective 2: Reduce the number of vehicles entering the Manhattan CBD daily.
- Objective 3: Create a funding source for capital improvements and generate sufficient annual net revenues to fund \$15 billion for capital projects for the MTA Capital Program.

FHWA and the Project Sponsors did not use the fourth Project goal, “Establish a tolling program consistent with the purposes underlying the New York State legislation entitled the ‘MTA Reform and Traffic Mobility Act’” for screening of alternatives.

If, through the screening evaluation, FHWA and the Project Sponsors determined that a preliminary alternative would not meet one or more of the three Project objectives used for screening, they dismissed that alternative from further consideration as an alternative that is not reasonable. As noted in **Table 2-2**, the Project Sponsors established quantitative criteria consistent with the evaluation results for best-performing options in prior proposals,¹⁰ for determining the consistency of preliminary alternatives with the two congestion-related Project objectives.

- **3** For Objective 1, the evaluation used a reduction of 5 percent relative to the No Action Alternative as the quantitative screening criterion because it represents a meaningful reduction in VMT. Since VMT incorporates the number of vehicles as well as the distance they travel, changes in VMT would be smaller than changes in the number of vehicles.
- For Objective 2, the evaluation used a reduction of 10 percent relative to the No Action Alternative as the quantitative screening criterion because it represents a meaningful reduction in the number of vehicles. As noted, the reduction in the number of vehicles is expected to be larger than the reduction in VMT.

As shown in **Table 2-2**, and the explanatory notes below it, only Alternative T-4 (Zone-based pricing through the CBD Tolling Program) would meet the purpose for the Project and the screening criteria tied to the objectives. Consequently, Alternative T-4, the CBD Tolling Program, is the only reasonable build alternative and the only build alternative evaluated in detail in this EA.

¹⁰ See, for example, The City of New York, Mayor Michael R. Bloomberg. *PlaNYC: A Greener, Greater New York*. April 2007. http://www.nyc.gov/html/planyc/downloads/pdf/publications/full_report_2007.pdf and New York City Traffic Congestion Mitigation Commission. *Report to the Traffic Congestion Mitigation Commission & Recommended Implementation Plan*. January 31, 2008.

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-
-  Number: 1 Author: BPC Resident Subject: Highlight Date: 6/12/23, 7:14:35 AM
The reduction of VMT does not appear to jive with a scheme that is based on a daily clock. Please analyze if this is actually an objective given the proposed scheme.
-
-  Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 7:14:35 AM
Reduction of vehicles entering the CBD is only loosely correlated to VMT as it does not address vehicles on roadways.
-
-  Number: 3 Author: BPC Resident Subject: Highlight Date: 6/12/23, 7:14:35 AM
Delivery vehicles will both pass on the charges to consumers and also implement hand-truck loading "across" 60th Street, which will create a whole new style of congestion.

Table 2-2. Results of Preliminary Alternatives Screening¹

ALTERNATIVE	PURPOSE AND NEED: Reduce traffic congestion in the Manhattan CBD in a manner that will generate revenue for future transportation improvements	OBJECTIVE 1: Reduce daily VMT within the Manhattan CBD Criterion: Reduce by 5% (relative to No Action)	OBJECTIVE 2: Reduce the number of vehicles entering the Manhattan CBD daily Criterion: Reduce by 10% (relative to No Action)	OBJECTIVE 3: Create a funding source for capital improvements and generate sufficient annual net revenues to fund \$15 billion for capital projects for MTA's Capital Program
NA-1: No Action	Does not meet	Does not meet	Does not meet	Does not meet
NTP-1: Parking pricing strategies	Does not meet	Does not meet (see note 2)	Does not meet	Does not meet (see note 2)
T-1: Pricing on full roadways: Raise tolls or implement variable tolls on existing toll facilities	Does not meet	Does not meet (see note 3)	Does not meet (see note 3)	Does not meet
T-2: Pricing on full roadways: Toll East and Harlem River bridges	Does not meet (see note 4)	Meets	Meets	Does not meet (see note 4)
T-3: High-occupancy toll (HOT) lanes	Does not meet (see note 5)	Does not meet	Does not meet	Does not meet (see note 5)
T-4: Zone-based pricing: CBD Tolling Program	Meets	Meets	Meets	Meets
1 1: Parking pricing: Reduce government-issued parking permits	Does not meet	[Does not meet (see note 6)]	[Does not meet (see note 6)]	Does not meet
O-2: Provide additional taxi stands to reduce cruising	Does not meet	Does not meet (see note [7])	Does not meet	Does not meet
O-3: Create incentives for teleworking	Does not meet	Does not meet	Does not meet (see note [8])	Does not meet
O-4: Ration license plates	Does not meet	Meets	Meets	Does not meet
O-5: Mandatory carpooling	Does not meet	Meets	Meets	Does not meet
2 O-6: Truck time-of-day delivery restrictions	Does not meet	2 Does not meet (see note [9])	Does not meet (see note [9])	Does not meet

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The evaluation criteria of this option does not account for the reduced congestion on non-travel lanes which is a second order effect for delivery trucks. Analysis is not correct here.



Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 7:18:00 AM

This is an inaccurate statement. Most buildings in the CBD are open 24hrs, and if they are not, they have package reception facilities that are.

Notes for Table 2-2

- ¹ Screening was based on a variety of prior studies and documents, including the following: New York City Traffic Congestion Mitigation Commission, "Congestion Mitigation Strategies: Alternatives to the City's Plan" (December 10, 2007); and "Report to the Traffic Congestion Mitigation Commission & Recommended Implementation Plan" (January 31, 2008), and its appendices, including Cambridge Systematics, Inc., "Technical Memorandum: Telecommuting Incentives," prepared for New York City Economic Development Corporation and New York City Department of Transportation (December 10, 2007); Cambridge Systematics, Inc., "Technical Memorandum: Night Delivery Incentives," prepared for New York City Economic Development Corporation and New York City Department of Transportation (December 10, 2007); Cambridge Systematics, Inc., "Technical Memorandum: Congestion Reduction Policies Involving Taxis," prepared for New York City Economic Development Corporation and New York City Department of Transportation (December 10, 2007); Cambridge Systematics, Inc., "Technical Memorandum: Increase Cost of Parking in the Manhattan Central Business District (CBD)," prepared for New York City Economic Development Corporation and New York City Department of Transportation (December 10, 2007).
- ² For NTP-1: **[Vehicle-miles traveled (VMT)]** reduction was estimated at substantially less than 1 percent. Further, there is no law or agreement in place between the City of New York and MTA that would direct the revenue generated from this alternative to MTA to support the Capital Program.
- ³ For T-1: This alternative would generate revenue, but the annual net revenues would not be sufficient to fund \$15 billion for capital projects for MTA's Capital Program. The revenue as well as reduction in VMT and number of vehicles with this alternative depends on how high the toll is raised and whether tolls are increased only on TBTA facilities or both TBTA and Port Authority of New York and New Jersey facilities. However, with some crossings remaining untolled, traffic would divert to untolled facilities, thereby reducing the revenue and not reducing traffic. Further, this alternative would not target congestion in the Manhattan CBD, given that a number of free entry points to the Manhattan CBD would remain available.
- ⁴ For T-2: Earlier studies showed this alternative would reduce congestion and could raise toll revenues equivalent to Project objectives. However, there is no law or agreement in place between the City of New York and MTA that would direct the revenue to MTA to support the Capital Program. **[In addition, the 2008 New York City Traffic Congestion Mitigation Commission Study identified a number of disadvantages to this alternative, including that this alternative would not address trips that start and end within Manhattan, such as trips beginning or ending on the Upper East Side and Upper West Side; and that this alternative would adversely affect local trips between the South Bronx and Harlem/Washington Heights, which could result in a local adverse economic impact in two environmental justice communities.]**
- ⁵ For T-3: HOT Lanes can be effective revenue generators, but their ability to reduce congestion and raise enough revenue to meet the target is limited due to the availability of free lanes on the same highway.
- ⁶ **[1] For O-1: Earlier studies concluded that reducing parking placards issued to government employees would reduce VMT south of 86th Street by 0.1 to 0.3 percent, depending on the size of the reduction (reductions evaluated ranged from 3,000 to 10,000 placards). With this level of VMT reductions, this alternative also would not reduce the number of vehicles entering the Manhattan CBD enough to meet the Project objective.]**
- ^[7] For O-2: Provision of additional taxi stands would have no effect on the number of taxis entering the Manhattan CBD and would not necessarily reduce VMT since taxis would need to travel back to a taxi stand after discharging customers. Further, this alternative would not broadly address VMT for all vehicles, nor would it reduce the number of vehicles entering the Manhattan CBD.
- ^[8] For O-3: Earlier studies concluded that this alternative would reduce New York City commute trips by less than 2 percent. Recent experience with the COVID-19 pandemic has supported that conclusion. As the region returns to normal business activities, following large-scale, full-time teleworking, many office workers are continuing to telework, but traffic levels are returning to close to pre-COVID-19 pandemic levels (for more information, see Chapter 1, "Introduction," Section 1.4.1). With such minimal impact, even combining this alternative with others like NTP-1 or O-2 would not yield congestion reductions and new revenue to meet the Project's purpose, need and objectives.
- ^[9] For O-6: To be successful, truck time-of-day restrictions would require receivers to be open and willing to receive the vehicles in overnight hours. Further, depending upon how the restrictions are implemented, some large trucks might instead send multiple small trucks, thereby increasing vehicle numbers and VMT.

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These numbers are incorrect as government employee vehicles cause significantly more congestion than private passenger vehicles. Not only is the roadway occupied during travel, but also during parking. Passenger vehicles using underground parking are not occupying the roadways.

Has there been an analysis on the impact of an elimination or reduction of these permits? Would there be 10,000 more spots for trucks to idle for deliveries, getting them off of the traveling lanes?

- NYCDOT would continue to develop bicycle and bus infrastructure including new bicycle and bus lanes.¹³

With the No Action Alternative, existing tolls at bridges and tunnels connecting to Manhattan that are managed by TBTA and the PANYNJ would remain in effect. (See **Chapter 4, “Transportation,” Section 4.1** for more information on current tolls.) In the No Action Alternative, East River and Harlem River crossings—most of which are under the control of NYCDOT—would remain untolled.

2.4.2 CBD Tolling Alternative

2.4.2.1 Overview

The CBD Tolling Alternative would implement a vehicular tolling program to reduce traffic congestion in the Manhattan CBD, consistent with the Traffic Mobility Act.¹⁴ After covering Project-related capital and operating expenses, the revenue collected would fund projects in the MTA 2020–2024 Capital Program and successor capital programs.

¹The Manhattan CBD consists of the geographic area of Manhattan south and inclusive of 60th Street, but not including Franklin D. Roosevelt Drive (FDR Drive), West Side Highway/Route 9A, the Battery Park Underpass, and any surface roadway portion of the Hugh L. Carey Tunnel connecting to West Street (the West Side Highway/Route 9A). With the CBD Tolling Alternative, TBTA would toll vehicles entering or remaining in the Manhattan CBD via a cashless tolling system. The toll would apply to all registered vehicles (i.e., those with license plates) with the exception of qualifying vehicles transporting persons with disabilities and qualifying authorized emergency vehicles.^{15, 16} Passenger vehicles would be tolled no more than once a day.¹⁷ Vehicles that “remain” in the Manhattan CBD are vehicles that are detected when leaving, but were not detected entering in the same day. Given that they were detected leaving, they must have driven through the Manhattan CBD to get to the detection point, and therefore “remained” in it during a portion of the day. These vehicles would be charged that day for remaining in the Manhattan CBD.

¹³ New bicycle lanes and bus lanes were incorporated in the transportation modeling conducted for this EA and described in **Subchapter 4A, “Transportation: Regional Transportation Effects and Modeling,”** as appropriate.

¹⁴ The Traffic Mobility Act amended portions of certain New York State laws, including the Vehicle and Traffic Law, the Public Authorities Law, and the Tax Law. **Appendix 2B, “Project Alternatives: MTA Reform and Traffic Mobility Act,”** provides the amended text of those laws.

¹⁵ Qualifying authorized emergency vehicle is defined in Consolidated Laws of the State of New York, Vehicle and Traffic Law, Title 1, Article 1 Section 101. As currently *[defined]*, qualifying vehicles transporting persons with disabilities include vehicles with government-issued disability license plates and fleet vehicles owned or operated by organizations and used exclusively to provide transportation to people with disabilities.

¹⁶ The toll would not apply to vehicles that are not subject to registration requirements, such as bicycles, electric scooters, bicycles with electric assist (“e-bikes”).

¹⁷ Passenger vehicle is defined by Consolidated Laws of the State of New York, Vehicle and Traffic Law, Title 4, Article 14 Section 401(6).

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Residents are being tolled for effectively no usage on the day they leave. This constitutes erecting a barrier for one to access their place of residence. It does not seem fair to the residents in the CBD.

Examples of how tolls would be applied for passenger vehicles include the following:

- If a passenger vehicle enters the Manhattan CBD on Monday morning and leaves Monday evening prior to midnight, it would be detected when it enters and when it leaves the Manhattan CBD. Because passenger vehicles would be charged only once daily, a single toll would be charged.
- If a passenger vehicle enters the Manhattan CBD on Monday and is parked until it leaves on Wednesday, it would be charged upon entering on Monday and for remaining when it drove through the Manhattan CBD on Wednesday to leave. This vehicle would not be charged when it was parked the full 24-hour period on Tuesday.
- If a passenger vehicle makes two round trips into the Manhattan CBD on the same day, it would be charged a single toll, because passenger vehicles would be charged only once daily.
- ¹a passenger vehicle is parked all week within the Manhattan CBD (for example, a vehicle owned by a resident of the Manhattan CBD) and then leaves the Manhattan CBD for a day trip on Saturday, the vehicle would be detected leaving (remaining) and re-entering the Manhattan CBD on the same day. Because passenger vehicles would be charged only once daily, a single toll would be charged on Saturday.
- If a passenger vehicle is parked all week within the Manhattan CBD (for example, a vehicle owned by a resident of the Manhattan CBD or a visitor to the Manhattan CBD) and then leaves the Manhattan CBD on Friday and returns on Monday, the vehicle would be identified as having remained on Friday since it was detected leaving; it would be identified as entering when it returns on Monday. It would receive a charge on Friday for remaining and on Monday for entering the Manhattan CBD. It would not be charged any other days when parked the entire day in the Manhattan CBD, nor the days when away.

Residents whose primary residence is inside the Manhattan CBD and whose New York adjusted gross income for the taxable year is less than \$60,000 would be entitled to a New York State tax credit equal to the aggregate amount of Manhattan CBD tolls paid during the taxable year.¹⁸ Residents of the Manhattan CBD with New York adjusted gross income of \$60,000 or higher would not be eligible for the tax credit.

The toll amount would vary by time of day, with higher tolls charged during peak periods when congestion is greater. The specific amounts of the tolls have not yet been determined, as discussed later in this chapter. In addition, certain types of vehicles would be exempt from the toll, and some vehicles that already pay tolls on crossings to and from the Manhattan CBD could receive crossing credits.

Consistent with the Traffic Mobility Act, the annual net revenues from the CBD Tolling Program would be sufficient to support a \$15 billion investment in the MTA Capital Program. MTA would use the net revenue

¹⁸ Consolidated Laws of the State of New York, Tax Law, Article 22, Section 606 (jjj).

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Again, it appears that residents are being unfairly charged for leaving their residence. Further, not clear that the resident is adding to congestion.

Traffic Mobility Act, this study must be completed 18 months after toll collection commences. In addition, following implementation of the CBD Tolling Program, TBTA, in consultation with NYCDOT, would report on the effects of the CBD Tolling Program on traffic operations, taxi and FHV usage, mass transit usage, and air quality. TBTA and NYCDOT would report on these effects one year after tolling implementation and every two years thereafter.

2.4.2.2 Tolling Infrastructure and Tolling System Equipment

The CBD Tolling Alternative would include tolling infrastructure and tolling system equipment to detect vehicles. This would include poles and mast arms, similar to those used for streetlights and traffic lights today; tolling system equipment housed in enclosures; and signage similar in size and character to signs already present throughout Manhattan. Tolling system equipment would include reader and meter cabinets and cameras. Consistent with the Traffic Mobility Act, TBTA and NYCDOT have entered into a Memorandum of Understanding for coordinating the planning and design and, should the CBD Tolling Alternative be selected, the installation, construction, and maintenance of the Project's tolling infrastructure, including signage (see **Appendix 2C, "Project Alternatives: Memorandum of Understanding Between TBTA and NYCDOT"**). The following sections describe proposed locations for the tolling infrastructure and tolling system equipment and the types of infrastructure and equipment.

Location of Tolling Infrastructure and Tolling System Equipment

The new tolling system would include detection points to identify all vehicles entering or leaving the **1**Manhattan CBD as well as verification points at certain locations along the West Side Highway/Route 9A and the FDR Drive.²² The poles for the CBD Tolling Alternative would be within the existing transportation right-of-way and would typically be at locations where standard poles are currently installed or would replace existing poles with new poles that are up to about 20 feet from the existing poles. In some locations, new poles would be installed where no poles currently exist. Where appropriate, tolling system equipment would be mounted on existing infrastructure (e.g., under pedestrian walkways and existing overhead sign infrastructure). At the Hugh L. Carey Tunnel and Queens-Midtown Tunnel, the existing tolling equipment would be used.

Based on preliminary design, tolling infrastructure and tolling system equipment would be installed at the following locations, with a total of 120 detection points:

- Near the 60th Street boundary to the Manhattan CBD, generally between 60th and 61st Streets, on all southbound and northbound roadways. This would include detection points close to 59th Street on the three access roads in Central Park that connect to 59th Street (Central Park South).
- At the exits from and entrances to all East River bridges (Brooklyn Bridge, Manhattan Bridge, Williamsburg Bridge, Ed Koch Queensboro Bridge, other than the ramp to 62nd Street) and tunnels under the jurisdiction of the PANYNJ (the Holland and Lincoln Tunnels) that connect to the Manhattan

²² Tolls would be charged for entering or remaining in the Manhattan CBD; detection points at exit locations would aid in identifying vehicles that have remained in the Manhattan CBD. Verification points along the West Side Highway/Route 9A and FDR Drive would be used to ensure that vehicles that remain on these roadways without entering the Manhattan CBD do not pay a toll.

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These "verification points" are unfairly tagging BPC residents as entering and leaving, when they are simply staying "within" their residential area.

CBD. This would include detection points on the ramps leading to and from the bridges and tunnels as well as detection points on the East River bridge structures over land. At the TBTA tunnels that connect to the Manhattan CBD (Hugh L. Carey Tunnel and Queens-Midtown Tunnel), existing open-road tolling infrastructure would be used.

- **1** Along the FDR Drive and the West Side Highway/Route 9A to identify vehicles that travel along those routes without entering the Manhattan CBD. These highway detection points would also aid in identifying vehicles that travel to locations on the east side of the FDR Drive (e.g., the Waterside apartment complex) and on the west side of the West Side Highway/Route 9A (e.g., Battery Park City or Hudson River Park) so that those vehicles are tolled.

Figure 2-1 illustrates the general locations where vehicles would pay the toll. Figure 2-2a through Figure 2-2j show in more detail the specific locations proposed for tolling infrastructure and tolling system equipment based on the preliminary design.

Types of Tolling Infrastructure and Tolling System Equipment

At each detection point, cameras and E-ZPass readers would be installed on tolling infrastructure in an arrangement that would allow capture of vehicle information from all traffic lanes. The proposed tolling system equipment would be clustered into single enclosures to reduce its visual impact. These enclosures would house the license plate reader cameras, illuminators, and antenna in a single unit comparable in size and mass to traffic control devices currently used throughout the area of visual effect. The cameras included in the array of tolling system equipment would use infrared illumination at night to allow images of license plates to be collected without the need for visible light.

Different tolling infrastructure would be used, depending on location, to minimize the Project footprint and reflect the existing setting. Based on preliminary design, this would include the following:

- **Modified NYCDOT M-2A poles at the curbside.** NYCDOT uses octagonal poles (M-2A poles) throughout New York City for traffic signals and streetlights. The CBD Tolling Alternative would install new poles that are similar in appearance to standard M-2A poles but would be larger in diameter (potentially up to 14 inches in diameter rather than 8.5 inches) to meet the critical structural performance requirements for mast-arm configurations. The modified M-2A poles would have larger foundations than a standard M-2A pole. From these poles, a new mast arm (similar to the mast arms that support traffic signals throughout New York City) would extend 20 to 50 feet over the roadway with tolling system equipment mounted on it. If an existing pole also supports a streetlight, then a streetlight would be provided on the replacement pole as well. The tolling system equipment mounted on mast arms would collect vehicle information from multiple lanes beneath the mast arm.
- **“Side fires” at the curbside.** In certain locations, tolling system equipment would be mounted on a standard M2-A pole without a mast arm, referred to as a “side fire.” The side-fire equipment would collect vehicle information from a single lane. Typically, this would occur at locations where a mast arm would be on one side of the street and a side fire on the other side of the street to allow full coverage of all lanes of the street.

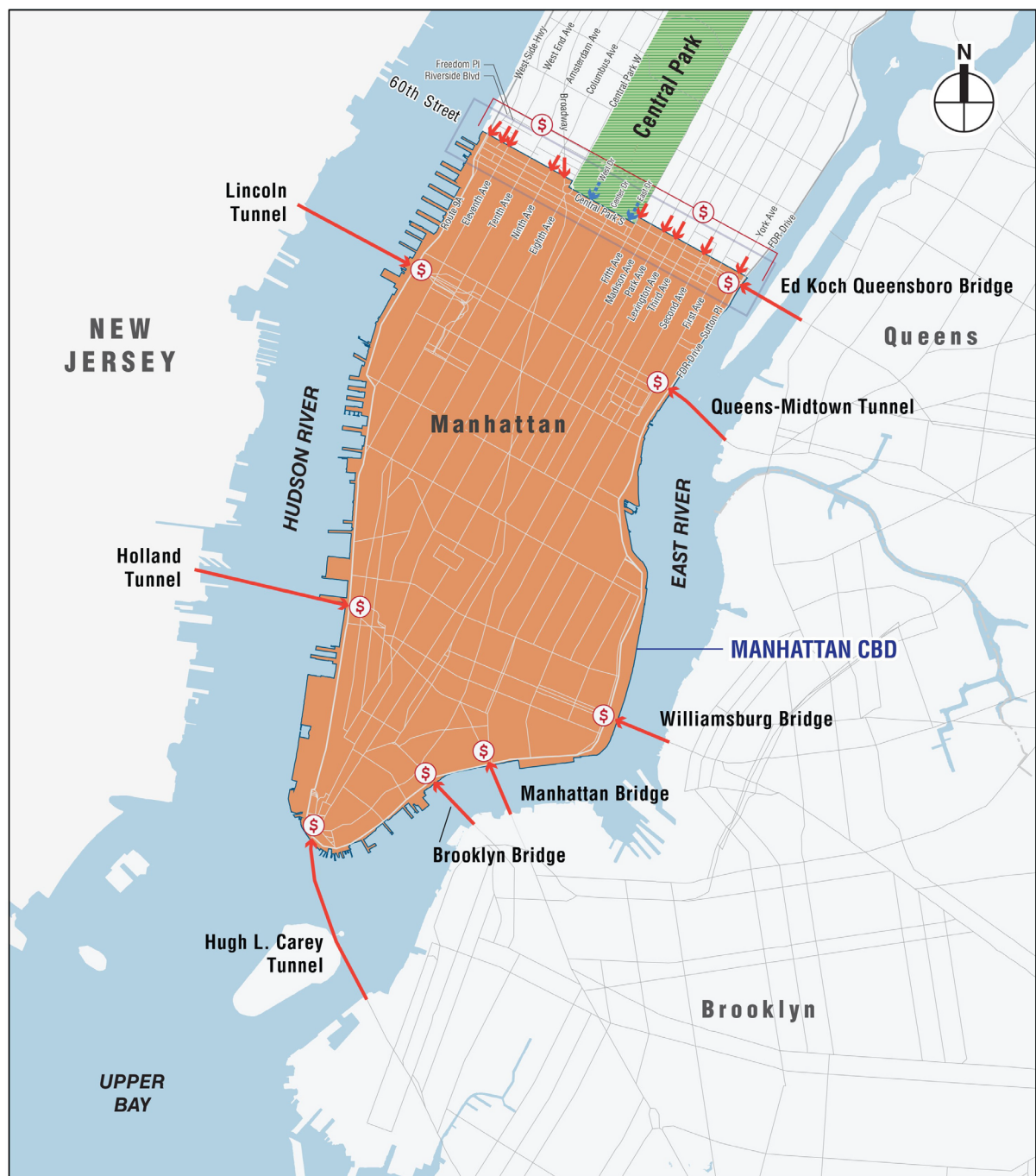
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It seems this section contradicts the concept that the highways are exempt. Further, it reinforces that there will be increased congestion on the exempted roads. The analysis should make these points clear.

Figure 2-1. **1** General Locations of New Tolls for Vehicles Accessing the Manhattan CBD



Manhattan CBD (as defined by the MTA Reform and Traffic Mobility Act)

Vehicular Entry Point

Vehicular Entry Point: Authorized Vehicles Only

New toll for vehicles entering the Manhattan CBD at this crossing
(locations shown are schematic and do not represent the specific location of new tolling infrastructure)

Source: Department of Information Technology & Telecommunications. NYC Open Data, NYC Planimetrics.
<https://data.cityofnewyork.us/Transportation/NYC-Planimetrics/wt4d-p43d>.

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Please clarify. This map implies that the tolls are designed to affect vehicles entering the zone, but in fact contradictory material states that the tolls also apply to residents of the zone with vehicles registered and garaged in the zone.

Figure 2-2h. **1** Proposed Locations of Tolling Infrastructure and Tolling System Equipment: Battery Park Underpass and Hugh L. Carey Tunnel



Infrastructure Type

- | | | | |
|------------|--------------------------|------------|----------------------------------|
| 1 1 | 20' or 25' Modified M-2A | 6 6 | Side Fire |
| 2 2 | 30' or 35' Modified M-2A | 7 7 | Girder |
| 3 3 | 50' Modified M-2A | 8 8 | Existing Overhead Sign Structure |
| 4 4 | 50' Region 10 | 9 9 | Existing Pedestrian Bridge |
| 5 5 | M-2A Side Fire | | |

Site Info

- | | |
|---|----------|
| ● | New |
| ■ | Existing |

0 300 FEET

Sources: TBTA. October 2021. New York State, NYS Interactive Mapping Gateway: NYSDOP High Resolution Imagery 2000 – 2018. <http://gis.ny.gov/gateway/mg/index.html>.

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Number: 1 Author: BPC Resident Subject: Highlight Date: 6/12/23, 7:50:15 AM

There seems to be a confusion here, the locations of these tolling points are not in the underpass, but instead on the West Side Highway where it terminates on Battery Place. Please clarify.

- **FDR Drive and West Side Highway/Route 9A.** Signage would notify drivers of the toll at locations along the FDR Drive and the West Side Highway/Route 9A near exits from those highways. ¹As noted earlier, drivers who use these highways would not be subject to the toll; the toll would apply once they enter the Manhattan CBD from the highway.) To reduce the number of signs at each exit from these highways into the Manhattan CBD, signage with maximum toll rates would be placed only at locations on the highways at the limits of the zone (e.g., on the West Side Highway/Route 9A near 60th Street, on the West Side Highway/Route 9A and at the exit of the Hugh L. Carey Tunnel).

Appendix 2D, Figure 2D-4, shows a typical entry and exit from the FDR Drive into the Manhattan CBD. Upon approach to the CBD boundary, drivers would typically see four signs. An “end toll zone” sign would be located at all entrances to the FDR Drive from the Manhattan CBD, indicating to the driver that they are exiting the zone and entering an excluded roadway.

Appendix 2D, “Project Alternatives: CBD Tolling Program Signage,” Figure 2D-5, shows the signage at a typical West Side Highway/Route 9A intersection with the local street grid.

Signs along the FDR Drive and the West Side Highway/Route 9A would range in size from 30 inches by 24 inches to 54 inches by 36 inches.

- **Brooklyn, Queens, and New Jersey Approaches.** For drivers entering the Manhattan CBD using an East River crossing from Brooklyn or Queens, signs along the highways leading to these crossings would notify drivers of the toll. A typical sequence is shown in Appendix 2D, Figure 2D-6. Existing signs would be modified to add necessary toll information where practicable. Following this typical signage sequence, there would be approximately 10 to 20 signs on the approach to each crossing, depending on the unique conditions of each highway approach.

There would also be signs on the Manhattan CBD side of these crossings indicating the start of the CBD for westbound traffic and the end of the CBD for eastbound traffic. The number of signs in these areas would vary based on the structure and layout of the ramps for these crossings.

For crossings between New Jersey and the Manhattan CBD, signage in New Jersey would follow a similar signage pattern and would use existing infrastructure to the greatest extent practicable. Signage in this area would be coordinated with the appropriate local jurisdictions during final design.

- **Central Park.** While public vehicular traffic is not permitted in Central Park, authorized vehicles (e.g., emergency response vehicles, park maintenance, park administration, vendors, and contractors) may use the roads when necessary. Two new signposts would be added within Central Park to notify drivers of entry into the CBD if they exit the park onto 59th Street. These signs would be on West Drive, a one-way southbound road, and next to the southbound lane of East Drive approaching Grand Army Plaza. Appendix 2D, Figure 2D-7, illustrates the two signs that would be installed at each of these approaches. The “begin toll zone” sign would be 30 inches by 24 inches and the “max toll rate” sign would be 36 inches by 36 inches. The signs would be affixed to a standard signpost that is approximately 3.5 inches by 2 inches in cross section at approximately 7 feet in height.

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Number: 1 Author: BPC Resident Subject: Highlight Date: 6/12/23, 7:50:15 AM

If you are a BPC resident, you are effectively required to use the highways. Other residents of the CBD can travel to most major services without utilizing the highways. This seems unfair. Please review.

Table 2-3. Tolling Scenarios Evaluated for the CBD Tolling Alternative

PARAMETER ¹	SCENARIO A	SCENARIO B	SCENARIO C	SCENARIO D	SCENARIO E	SCENARIO F	SCENARIO G
	Base Plan	Base Plan with Caps and Exemptions	Low Crossing Credits for Vehicles Using Tunnels to Access the CBD, with Some Caps and Exemptions	High Crossing Credits for Vehicles Using Tunnels to Access the CBD	High Crossing Credits for Vehicles Using Tunnels to Access the CBD, with Some Caps and Exemptions	High Crossing Credits for Vehicles Using Manhattan Bridges and Tunnels to Access the CBD, with Some Caps and Exemptions	Base Plan with Same Tolls for All Vehicle Classes
Time Periods²							
Peak: Weekdays	6 a.m. to 8 p.m.	6 a.m. to 8 p.m.	6 a.m. to 8 p.m.	6 a.m. to 8 p.m.	6 a.m. to 8 p.m.	6 a.m. to 10 a.m.; 4 p.m. to 8 p.m.	6 a.m. to 8 p.m.
Peak: Weekends	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.	10 a.m. to 10 p.m.
Off Peak: Weekdays	8 p.m. to 10 p.m.	8 p.m. to 10 p.m.	8 p.m. to 10 p.m.	8 p.m. to 10 p.m.	8 p.m. to 10 p.m.	10 a.m. to 4 p.m.	8 p.m. to 10 p.m.
Overnight: Weekdays	10 p.m. to 6 a.m.	10 p.m. to 6 a.m.	10 p.m. to 6 a.m.	10 p.m. to 6 a.m.	10 p.m. to 6 a.m.	8 p.m. to 6 a.m.	10 p.m. to 6 a.m.
Overnight Weekends	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.	10 p.m. to 10 a.m.
Potential Crossing Credits							
Credit Toward CBD Toll for Tolls Paid at the Queens-Midtown, Hugh L. Carey, Lincoln, Holland Tunnels	No	No	Yes	Yes	Yes	Yes	No
Credit Toward CBD Toll for Tolls Paid at the Robert F. Kennedy, Henry Hudson, George Washington Bridges	No	No	No	No	No	Yes	No
Potential Exemptions and Limits (Caps) on Number of Tolls per Day							
Autos, motorcycles, and commercial vans	Once per day	Once per day	Once per day	Once per day	Once per day	Once per day	Once per day
Taxis	No cap	Once per day	Exempt	No cap	Exempt	Once per day	No cap
FHVs	No cap	Once per day	Three times per day	No cap	Three times per day	Once per day	No cap
1 hall and large trucks	No cap	Twice per day	No cap	No cap	No cap	Once per day	No cap
Buses	No cap	Exempt	No cap	No cap	Transit buses – Exempt No cap on other buses	Exempt	No cap
Approximate Toll Rate Assumed³							
Peak	\$9	\$10	\$14	\$19	\$23	\$23	\$12
Off Peak	\$7	\$8	\$11	\$14	\$17	\$17	\$9
Overnight	\$5	\$5	\$7	\$10	\$12	\$12	\$7

¹ The parameters in this table were assumed for modeling purposes to evaluate the range of potential effects that would result from implementation of the CBD Tolling Alternative. Actual toll rates, potential credits, exemptions, and/or discounts, and the time of day when the toll rates would apply would be determined by the TBTA Board after recommendations are made by the Traffic Mobility Review Board. **Appendix 2E, "Project Alternatives: Definition of Tolling Scenarios,"** provides more detailed information on the rates, potential crossing credits, exemptions, and/or discounts assumed for each tolling scenario.

² Tolls would be higher during peak periods when traffic is greatest. These would be set forth by TBTA in the final toll schedule. All tolling scenarios include a higher toll on designated "Gridlock Alert" days, although the modeling conducted for the Project did not reflect this higher toll since it considers typical days rather than days with unusually high traffic levels.

³ Toll rates are for autos, commercial vans, and motorcycles using E-ZPass and are rounded. For all tolling scenarios, different rates would apply for vehicles not using E-ZPass; for Tolling Scenarios A through F, different vehicle classes would pay different tolls (see **Appendix 2E, "Definition of Tolling Scenarios"**). The peak E-ZPass rate (rounded) range across tolling scenarios for small trucks would be \$12–\$65; for large trucks, the range would be \$12–\$82.

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Why is there no specific differentiation here and why are the rates the same? If a resident drives 20 miles in the CBD, and a delivery truck drives 200, it seems unfair.

Given that increased crossing credits would come with higher tolls, truck diversions would also increase, resulting in noticeable reductions of truck through trips in the Manhattan CBD, but localized increases outside the Manhattan CBD.

With increasing crossing credits, higher vehicle volumes and VMT would occur at currently tolled entrance points to the Manhattan CBD, especially the Queens-Midtown Tunnel and the Hugh L. Carey Tunnel, resulting in more traffic on the Long Island Expressway and a shift of traffic along the Gowanus Expressway from the BQE to the Hugh L. Carey Tunnel, as well as increases in traffic on the local Manhattan streets that connect to these tunnels.

Higher crossing credits would lead to a larger mode shift from auto to transit for drivers entering the Manhattan CBD. Those tolling scenarios with the highest crossing credits would also have the highest mode shifts to transit outside of New York City, with increased ridership on commuter rail services and PATH.

- **Time of Day** – The effect of variable tolling at different times of the day is also considered.

Particularly in the overnight period, reducing the toll rate on trucks and other vehicles would reduce the diversion to alternative routes and limit increases to traffic on circumferential routes. This would reduce the overall vehicle and VMT improvement in the Manhattan CBD when compared with other tolling scenarios, although these reduced benefits would occur for the time period when congestion is less of a concern.

¹Previous studies have shown that while trucks are unlikely to shift their travel time, for private vehicles such options would be limited for the most part for Tolling Scenarios A through E, where the peak period would extend from 6 a.m. to 8 p.m. Tolling Scenario F would instead have two distinct peak periods, an AM peak (6 a.m. to 10 a.m.) and a PM peak (4 p.m. to 8 p.m.). A small portion of drivers would shift to enter the Manhattan CBD to the period of 5:30 a.m. to 6:00 a.m. in all tolling scenarios.

- **Exemptions and Caps for Taxis and FHV**s – As noted previously, while passenger vehicles may be charged only once daily, other vehicles may be charged each time they enter or remain in the Manhattan CBD. Several tolling scenarios include an option to provide caps to the number of times tolls would be charged for taxis and/or FHVs and/or exemptions for taxis and/or FHVs. The more exemptions and caps provided, the higher tolls need to be to meet the Project's congestion and revenue objectives. However, ²taxis and FHVs are charged for each trip, the demand for their service would decline, as would the number of trips they make.

Introducing caps or exemptions for taxis and/or FHVs would increase the number of vehicles and VMT within the Manhattan CBD relative to Tolling Scenario A, which would have no such caps or exemptions.

Including an exemption for taxis would result in an increase in taxi mode share relative even to cases where taxis are capped at once per day; however, this would also result in an associated increase in VMT and vehicles.

As with all the other variables, the more exemptions and caps provided, the higher the tolls would have to be to meet the revenue objective. Conversely, fewer (or no) exemptions and caps on taxis and FHVs

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Please clarify the studies that are being used to support this statement.



Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 8:05:32 AM

As noted previously, since 2019, a \$2.75 congestion charge already is being charged on a per trip basis. This charge is for the account of the individual passenger.

would result in a lower toll and less demand for taxis and FHV trips into and out of the Manhattan CBD, which would reduce the number of vehicles and VMT in the Manhattan CBD.

2.5 PREFERRED ALTERNATIVE

FHWA and the Project Sponsors have identified the CBD Tolling Alternative as the Preferred Alternative for the Project. The CBD Tolling Alternative would meet the Project purpose, which is to reduce traffic congestion in the Manhattan CBD in a manner that will generate revenue for future transportation improvements, pursuant to acceptance into the FHWA's Value Pricing Pilot Program. The CBD Tolling Alternative would also meet all four objectives identified for the Project (see **Chapter 1, "Introduction"**), as well as the screening criteria FHWA and the Project Sponsors used in the assessment of preliminary alternatives discussed in **Section 2.3**.

Table 2-4 illustrates how the CBD Tolling Alternative would meet the Project objectives and the specific evaluation criteria that FHWA and the Project Sponsors used in assessing preliminary alternatives and **Table 2-5** provides more detail comparing the results for each of the tolling scenarios within the CBD Tolling Alternative. **Subchapter 4A, "Transportation: Regional Transportation Effects and Modeling,"** provides more information on the transportation-related effects of the tolling scenarios. In addition, **Chapter 16, "Summary of Effects,"** compares the effects of the tolling scenarios and provides information on additional tolling scenarios considered but not evaluated in detail in this EA.

A preferred tolling scenario within the CBD Tolling Alternative has not been identified, though the analyses in this EA afford an understanding of how, if warranted, the toll schedule can be structured to avoid adverse effects. As described previously, the TBTA Board would adopt a final toll schedule, including toll rates and any crossing credits, discounts, and/or exemptions informed by recommendations made by the Traffic Mobility Review Board and following a public hearing in accordance with the State Administrative Procedure Act.

1 The selected alternative for the Project will be identified in the FHWA's decision document in consideration of comments received throughout the environmental review process, including those received on this EA and from the public outreach.

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As the process is currently set forth, it is deficient in collating the public's concerns. The residents making these comments only came to realize the impact of the proposed congestion pricing and CBD in the past week to 10 days. The process has not addressed the key issues for those impacted around the CBD and throughout Manhattan. We ask for further review of the process and how to better engage local communities/leaders.

Table 2-4. Comparison of Evaluation Results for the No Action and CBD Tolling Alternatives

SCREENING CRITERION	NO ACTION ALTERNATIVE	CBD TOLLING ALTERNATIVE
Purpose and Need: Reduce traffic congestion in the Manhattan CBD in a manner that will generate revenue for future transportation improvements	Does not meet	Meets
Objective 1: Reduce daily VMT within the Manhattan CBD Criterion: Reduce by 5% (relative to No Action)	Does not meet	Meets
<i>Daily VMT reduction (2023)</i>	0%	7.1%-9.2%
Objective 2: Reduce the number of vehicles entering the Manhattan CBD daily Criterion: Reduce by 10% (relative to No Action)	Does not meet	Meets
<i>Daily vehicle reduction (2023)</i>	0.0%	15.4%-19.9%
Objective 3: Create a funding source for capital improvements and generate sufficient annual net revenues to fund \$15 billion for capital projects for MTA's Capital Program	Does not meet	Meets ¹
¹ <i>Net revenue to support MTA's Capital Program ²</i>	\$0	\$1.02 billion - \$1.48 billion
Objective 4: Establish a tolling program consistent with the purposes underlying the New York State legislation entitled the "MTA Reform and Traffic Mobility Act"	Does not meet	Meets

¹ Although Tolling Scenario B would not meet Objective 3 with the toll rates identified and assessed in this EA, additional analysis was conducted to demonstrate that it would meet this objective with a higher toll rate; the resulting VMT reduction and revenue for that modified scenario would fall within the range of the other scenarios presented. **Chapter 16, "Summary of Effects,"** provides more information on the modified Tolling Scenario B.

² The net revenue needed to fund \$15 billion depends on a number of economic factors, including but not limited to interest rates and term. For the purposes of this EA, the modeling assumes the Project should provide at least \$1 billion annually in total net revenue, which would be invested or bonded to generate sufficient funds. The net revenue values provided in this table are rounded and based on Project modeling.

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Under the maximum toll plan, \$23/day, they are expecting to toll 175,000 vehicles per day. If the statistics about the 40,000 cars/hour entering over bridges/tunnels is true, surely they have no need to tax residents. The statistics support a residential exemption.


Table 2-5. Comparison of Evaluation Results for CBD Tolling Alternative Tolling Scenarios

SCREENING CRITERION	SCENARIO A Base Plan	SCENARIO B Base Plan with Caps and Exemptions	SCENARIO C Low Crossing Credits for Vehicles Using Tunnels to Access the CBD, with Some Caps and Exemptions	SCENARIO D High Crossing Credits for Vehicles Using Tunnels to Access the CBD	SCENARIO E High Crossing Credits for Vehicles Using Tunnels to Access the CBD, with Some Caps and Exemptions	SCENARIO F High Crossing Credits for Vehicles Using Manhattan Bridges and Tunnels to Access the CBD, with Some Caps and Exemptions	SCENARIO G Base Plan with Same Tolls for All Vehicle Classes
Purpose and Need: Reduce traffic congestion in the Manhattan CBD in a manner that will generate revenue for future transportation improvements	Meets	Meets	Meets	Meets	Meets	Meets	Meets
Objective 1: Reduce daily VMT within the Manhattan CBD Criterion: Reduce by 5% (relative to No Action)	Meets	Meets	Meets	Meets	Meets	Meets	Meets
<i>Daily VMT reduction (2023)</i>	7.8%	7.6%	8.0%	8.7%	9.2%	7.1%	8.4%
Objective 2: Reduce the number of vehicles entering the Manhattan CBD daily Criterion: Reduce by 10% (relative to No Action)	Meets	Meets	Meets	Meets	Meets	Meets	Meets
<i>Daily vehicle reduction (2023)</i>	15.4%	15.7%	17.3%	18.7%	19.9%	18.3%	16%
Objective 3: Create a funding source for capital improvements and generate sufficient annual net revenues to fund \$15 billion for capital projects for MTA's Capital Program	Meets	Does not meet ¹	Meets	Meets	Meets	Meets	Meets
<i>Net revenue to support MTA's Capital Program</i> ²	\$1.06 billion	\$830 million	\$1.10 billion	\$1.34 billion	\$1.48 billion	\$1.02 billion	\$1.10 billion
Objective 4: Establish a tolling program consistent with the purposes underlying the New York State legislation entitled the "MTA Reform and Traffic Mobility Act"	Meets	Meets	Meets	Meets	Meets	Meets	Meets

¹ Although Tolling Scenario B would not meet Objective 3 with the toll rates identified and assessed in this EA, additional analysis was conducted to demonstrate that it would meet this objective with a slightly higher toll rate and the resulting VMT reduction and revenue for that modified scenario would fall within the range of the other scenarios presented. **Chapter 16, "Summary of Effects,"** provides more information on the modified Tolling Scenario B. It would meet this objective with a modified toll rate, while continuing to meet the other objectives.

² The net revenue needed to fund \$15 billion depends on a number of economic factors, including but not limited to interest rates and term. For the purposes of this EA, the modeling assumes the Project should provide at least \$1 billion annually in total net revenue, which would be invested or bonded to generate sufficient funds. The net revenue values provided in this table are rounded and based on Project modeling.

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 Number: 1 Author: BPC Resident Subject: Highlight Date: 6/12/23, 9:30:43 AM
Please clarify. The scenario seems contradictory to the purpose of the CBD and congestion pricing?

3. Environmental Analysis Framework

3.1 FEDERAL APPROVALS AND CLASS OF ACTION

The CBD Tolling Program is classified as a NEPA Class III EA action in accordance with 23 Code of Federal Regulations (CFR Section 771.115). NEPA Class III actions are those in which the significance of the environmental impact is not clearly established. This EA has been prepared to determine whether the Project is likely to have a significant impact and requires the preparation of an Environmental Impact Statement.

3.2 COORDINATION WITH FEDERAL AND STATE RESOURCE AGENCIES

FHWA and the Project Sponsors have sought the expertise of and/or information from the following Federal and New York State agencies in preparing this EA:

- U.S. Federal Transit Administration (FTA)
- U.S. Environmental Protection Agency (USEPA)
- U.S. National Park Service (NPS)
- *[U.S. Department of Health and Human Services (HHS)]*
- New York State Department of Environmental Conservation (NYSDEC)
- New York State Department of State (NYSDOS)
- New York State Historic Preservation Office at the New York State Office of Parks, Recreation and Historic Preservation (OPRHP or SHPO)

FHWA and the Project Sponsors coordinated with these agencies about their areas of expertise with respect to methodologies for documenting environmental conditions and assessing effects. The Project Sponsors also coordinated with New York City agencies about potential effects on resources under their jurisdiction, including the New York City Department of Parks and Recreation, the New York City Department of Environmental Protection, *[the New York City Department of Health and Mental Hygiene, the New York City Taxi and Limousine Commission, the New York City Department of Education]*, and the New York City Landmarks Preservation Commission. There have been and will continue to be meetings with the agencies during this NEPA review. The recommendations of these agencies have been considered and incorporated into this EA, as appropriate.

¹ FHWA has also coordinated with Federally recognized Native American tribes, and FHWA and the Project Sponsors coordinated with transportation agencies from throughout the New York City region *[(Connecticut, New Jersey, and New York)]*. The Project Sponsors also conducted extensive outreach to environmental justice (minority and low-income) populations in the regional study area. (Refer to **Chapter 18, “Agency Coordination and Public Participation,”** for more information about agency participation in the NEPA process.)

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Please advise the Native American tribes with which the FHWA has coordinated.

Figure 3-3a. **1** Key Map and Proposed Locations of Tolling Infrastructure and Tolling System Equipment Along FDR Drive and West Side Highway/Route 9A



Sources: TBTA. October 2021. New York State, NYS Interactive Mapping Gateway: New York Statewide Digital Orthoimagery Program (NYSODP) High Resolution Imagery 2000 – 2018. <http://gis.ny.gov/gateway/mg/index.html>.

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The Equal Protections Act should apply to residents of BPC who are being penalized for living on the "wrong side" of the highway. Likewise residents of 60th Street are penalized vs their neighbors on 61st Street. Please analyze.

4. Transportation

As the commercial and economic hub of the region, 8 million daily trips are made to and from Manhattan's CBD.¹ These trips comprise vehicular trips (e.g., auto, truck, motorcycle), transit (e.g., subway, commuter rail, bus, ferry), and pedestrian and bicycle trips. Trips to and from the Manhattan CBD are generated throughout the 28-county transportation planning region used in this analysis.

Because of the size of the region and the extent of the analysis, this transportation chapter includes five subchapters:

- Subchapter 4A, Regional Transportation Effects and Modeling
- Subchapter 4B, Highways and Local Intersections
- Subchapter 4C, Transit
- Subchapter 4D, Parking
- Subchapter 4E, Pedestrians and Bicycles

A comprehensive analysis of the relevant transportation effects of the CBD Tolling Alternative is provided in each of those subchapters, along with description of the analytical framework and process used to assess the effects discussed therein. Broadly, ¹the process entailed data collection, regional model development, simulations, and quantitative and/or qualitative analyses. Initial context is provided in the following sections to describe the density and complexity of the regional transportation network, particularly when traveling to the Manhattan CBD.

4.1 ROADWAY ACCESS TO THE MANHATTAN CBD

Manhattan is separated from the rest of New York City by the Harlem River, East River, and New York Harbor and from New Jersey by the Hudson River, with 20 vehicular bridges and tunnels connecting to Manhattan. **Figure 4-1** shows the crossings into Manhattan, and **Figure 4-2** shows all vehicular entry and exit points for the Manhattan CBD. **Table 4-1** and **Table 4-2** list the bridges and tunnels, and **Table 4-3** lists the 2022 toll rates for automobiles at each of the tolled crossings.

¹ New York Metropolitan Transportation Council, *Hub Bound Travel Data Report 2017*.

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Please direct us to where the data is that is used for such analysis.

Chapter 4, Transportation

that is tolled in both directions; the Henry Hudson Bridge over the Harlem River from the Bronx, a TBTA facility that is tolled in both directions; and the George Washington Bridge over the Hudson River from New Jersey, a PANYNJ facility that is tolled in the inbound (to Manhattan) direction.²

Motorists must use the river crossings or the West Side Highway/Route 9A and the FDR Drive to access the region's interstate highways located outside the Manhattan CBD. From the Holland Tunnel, vehicles may connect to the New Jersey Turnpike Extension (I-78) and NJ Route 139 to US Routes 1 and 9. From the Lincoln Tunnel, vehicles may connect via NJ Route 495 to the New Jersey Turnpike (I-95) and NJ Routes 3 and 17. From the Hugh L. Carey Tunnel, vehicles may access the Gowanus Expressway (I-278) and Prospect Expressway (NY Route 27) in Brooklyn. The Williamsburg Bridge has direct access to the Brooklyn-Queens Expressway (I-278) in Brooklyn, and the Brooklyn and Manhattan Bridges have ramp connections to the Brooklyn-Queens Expressway near their Brooklyn landings. The Queens-Midtown Tunnel leads directly to the Long Island Expressway (I-495) in Queens. Motorists can access the interstate network north of the Manhattan CBD (I-80, I-87, I-95, and I-278, multiple parkways, and New York and New Jersey state highways) via the West Side Highway/Route 9A and Henry Hudson Parkway or the FDR Drive, either directly or using various connecting roadways. Some facilities such as the FDR Drive and certain parkways prohibit trucks and buses.

4.2 TRANSIT ACCESS TO THE MANHATTAN CBD

¹The New York metropolitan region has a robust transit network, much of it operating 24 hours per day/7 days per week/365 days per year, and the Manhattan CBD is the hub for much of it. People traveling to the Manhattan CBD can arrive by rail, subway, bus, tram, ferry, and paratransit (Figure 4-3).³

² TBTA collects tolls at its facilities using open-road, cashless tolling. Tolls are charged to E-ZPass accounts for those who have E-ZPass tags. For vehicles without E-ZPass tags, customers may participate in the regional Tolls by Mail program through which license plate images are matched with information from the relevant Department of Motor Vehicles and a bill is sent to the registered vehicle owner. Motorists can also set up temporary, short-term accounts (for example, if they are planning to use a rental car in New York City). PANYNJ accepts E-ZPass at all of its bridges and tunnels, including the Holland and Lincoln Tunnels and the George Washington Bridge. The Holland Tunnel and the George Washington Bridge operate with cashless tolling. PANYNJ allow[ed] cash toll collection at the Lincoln Tunnel [through December 11, 2022, when it transitioned] to cashless tolling.

³ A limited number of people also arrive by helicopter at one of three heliports in Manhattan and by seaplane using the Midtown Skyport on the East River.

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Not all modes of transportation operate 24 hours a day (such as buses and ferries). In the BPC area, the M9, m20, and M22 buses do not operate late at night/early morning. The Downtown Connection bus only operates 9.5 hours/day. Further, subways tend to be slower late at night with fewer trains and longer wait times in stations.

4.2.1 Subways

The New York City subway is the most widely used transit mode for access to the Manhattan CBD by residents of New York City.⁴ It is the largest subway system in the United States, both in terms of miles of track and number of passengers served per year. The subway system comprises 25 routes serving 472 stations across the boroughs of the Bronx, Brooklyn, Manhattan, and Queens with 665 miles of track for transporting passengers (revenue track) with additional track to support operations (nonrevenue track). In 2019, the New York City subway had an average weekday ridership of about 5.5 million people and an annual ridership of 1.66 billion passengers. All but three of the 25 subway routes serve the Manhattan CBD, and the Manhattan CBD contains the system's 10 busiest stations.⁵

New York subway routes form an integrated network with free transfers between routes at many stations in the Manhattan CBD. For example, the Times Square subway station complex, which also includes stations on Sixth and Eighth Avenues, provides free connections between 16 subway routes (A, C, and E; N, Q, R, W, S, and Nos. 1, 2, 3, 7; and B, D, F, and M). The World Trade Center-Fulton Street Station complex in Lower Manhattan provides free transfers between 12 subway routes (E; N, R, and W; and A, C, J, Z, and Nos. 2, 3, 4, 5).⁶ The subway also connects with regional transit hubs in the Manhattan CBD, allowing for connections from other modes. These include two stations with direct pedestrian connections to Penn Station New York and Moynihan Train Hall, a station complex beneath Grand Central Terminal, and a connection from the Times Square station complex via the 42nd Street-Port Authority Bus Terminal subway station to the Port Authority Bus Terminal.

1 fall 2019, 2,228,000 people entered the Manhattan CBD by subway on an average weekday, which accounted for 58 percent of all people who entered the Manhattan CBD.⁷

4.2.2 Port Authority Trans-Hudson

Port Authority Trans-Hudson (PATH) is a rapid transit system serving Newark, Harrison, Hoboken, and Jersey City in New Jersey, as well as Lower and Midtown Manhattan in New York City. PANYNJ operates the PATH system, which comprises four routes and 13 stations (six in the Manhattan CBD and seven in New Jersey). PATH trains run from either Newark or Hoboken and into the Manhattan CBD with Manhattan termini at the World Trade Center and 33rd Street, just south of Penn Station New York. The system is just about 14 miles total in length. The PATH trains that terminate at West 33rd Street make intermediate stops within the Manhattan CBD. Trains that go to the World Trade Center make only that single stop in Manhattan. PATH train passengers can connect to the New York City subway at multiple PATH stations in

⁴ The subway does not provide access to the Manhattan CBD from Staten Island.

⁵ Metropolitan Transportation Authority. "Subway and Bus Ridership for 2019." <https://new.mta.info/agency/new-york-city-transit/subway-bus-ridership-2019>.

⁶ The Cortlandt Street (No. 1 line) subway station is located within the World Trade Center site, but there is no fare-free connection between this station and the World Trade Center-Fulton Street station complex.

⁷ New York Metropolitan Transportation Council. January 2021. *Hub Bound Travel Data Report 2019*. https://www.nymtc.org/Portals/0/Pdf/Hub%20Bound/2019%20Hub%20Bound/DM_TDS_Hub_Bound_Travel_2019.pdf?ver=GS5smEoyHSsHsyX_t_Zriw%3d%3d.

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We note that these are pre-COVID numbers and are no longer accurate. We ask that the analysis be updated to reflect the current statistics.

Manhattan, but they must pay an additional fare. ¹ fall 2019, an average of 273,447 people entered and exited the Manhattan CBD via the PATH train on average weekdays.⁸

4.2.3 Commuter Rail

New York City has the largest commuter rail network in the United States and includes MTA's Long Island Rail Road (LIRR) and Metro-North Railroad (Metro-North), as well as New Jersey Transit Corporation (NJ TRANSIT). Two commuter rail stations are in the Manhattan CBD—Grand Central Terminal and Penn Station New York. Metro-North serves Grand Central Terminal, while LIRR and NJ TRANSIT serve Penn Station New York. Projects are underway that will allow for some LIRR service at Grand Central Terminal and some Metro-North service at Penn Station New York.

LIRR operates between Manhattan and Long Island with station stops in Brooklyn and Queens in New York City and Nassau and Suffolk Counties on Long Island. With an average weekday ridership of 301,000 passengers across 735 trains, it is the busiest commuter railroad in North America. LIRR has 124 stations across 11 regularly operating branches and 319 miles of track in customer service. Most LIRR inbound trains terminate at Penn Station New York. Some LIRR trains terminate at Atlantic Terminal in Brooklyn or Hunters Point Terminal in Queens, where passengers can transfer to the subway and continue their trip to the Manhattan CBD. In addition to the Manhattan CBD, LIRR serves major commercial centers in Downtown Brooklyn and Nassau and Suffolk Counties. ² fall 2019, an average of 246,843 people entered and exited the Manhattan CBD via LIRR on weekdays.⁹

Metro-North runs service between New York City and its northern suburbs in New York and Connecticut and provides local rail service within the New York City boroughs of Manhattan and the Bronx. Metro-North has five major branches (though some of the branches have multiple spurs) serving 124 stations within the regional study area. Two branches serve Rockland and Orange Counties, which are north of New York City and west of the Hudson River, and share tracks with NJ TRANSIT en route to their terminal in Hoboken, New Jersey. Three branches provide service between Grand Central Terminal and the Bronx, New York counties east of the Hudson River, and Connecticut. According to MTA, the system has an annual ridership of about 87 million people with close to 400 miles of track in customer service. In addition to serving the Manhattan CBD, Metro-North stops at large commercial districts in Yonkers, White Plains, and New Rochelle in New York as well as Stamford and New Haven, Connecticut. ³ fall 2019, an average of 226,296 people entered and exited the Manhattan CBD via Metro-North on average weekdays.¹⁰

NJ TRANSIT commuter rail connects 13 of the 14 New Jersey counties in the regional study area to the Manhattan CBD through its eight branches that serve the New York metropolitan region with close to 450 miles of track in customer service (excludes the Atlantic City branch). The eastern termini of NJ TRANSIT

⁸ New York Metropolitan Transportation Council. January 2021. *Hub Bound Travel Data Report 2019*. https://www.nymtc.org/Portals/0/Pdf/Hub%20Bound/2019%20Hub%20Bound/DM_TDS_Hub_Bound_Travel_2019.pdf?ver=GS5smEoyHSsHsyX_t_Zriw%3d%3d.

⁹ Ibid.

¹⁰ Ibid.

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trains are Penn Station New York, Newark Penn Station, or the Hoboken Terminal. From Newark, passengers can transfer to a Penn Station New York-bound commuter rail train or can access PATH. From Hoboken, commuters can transfer to PATH or a ferry to complete the journey into the Manhattan CBD.¹¹ fall 2019, an average of 212,191 people entered and exited the Manhattan CBD via NJ TRANSIT commuter rail on average weekdays.¹¹

4.2.4 ²uses

New York City and the regional study area have an extensive network of buses. Commuter buses typically provide direct service between New York City neighborhoods or suburban communities and the Manhattan CBD and other employment centers in the region. Express or limited stop buses provide higher speed service on the more heavily patronized routes, and local buses operate throughout New York City and other counties in the regional study area. MTA has two subsidiaries—New York City Transit and MTA Bus—that operate bus service in New York City. NJ TRANSIT is the primary operator of commuter, express, and local buses in New Jersey, although some private bus operators provide both commuter and local bus services. Multiple public and private bus operators serve the suburban counties of New York and Connecticut.

MTA operates an extensive network of buses in New York City. Combined, New York City Transit and MTA Bus operate 234 local routes, 20 Select Bus Service routes (with payment prior to boarding to reduce dwell times at stops), and 73 commuter/express bus routes. The Manhattan CBD is well-served by buses. Express bus services available from Queens, Brooklyn, the Bronx, and Staten Island offer service to locations in Lower and Midtown Manhattan. The Manhattan CBD has multiple Select Bus Service routes (M14A, M14D, M15, and M23, M34, and M34A), which operate higher speed service with fewer stops than the local bus routes. Local bus routes (some of which have limited service with fewer stops) operate on most north-south avenues through the Manhattan CBD with continued service to Upper Manhattan. Crosstown local bus routes operate between the east and west sides of Manhattan on most two-way crosstown streets (e.g., Houston Street, 14th Street, 23rd Street, 34th Street, 42nd Street, and 57th Street). Crosstown service is available on pairs of one-way streets (e.g., St. Marks Place/Eighth Street and Ninth Street, 49th Street and 50th Street, and East 59th and East 60th Streets). Riders receive one free transfer between local, limited, and Select Bus Service routes and other local and Select Bus Service routes as well as the subway within two hours of the first swipe of a MetroCard. Customers may transfer to or from a commuter bus from a local bus, Select Bus Service bus, or subway, but they must pay the difference in the fare. Riders must pay for a transfer to an express service unless using an Unlimited Express Bus MetroCard.

The busiest bus route in all of New York City is the M15 local/M15 Select Bus Service, which operates along First and Second Avenues in Manhattan from the South Ferry Terminal in Lower Manhattan to 126th Street in the East Harlem neighborhood of Upper Manhattan.

¹¹ New York Metropolitan Transportation Council. January 2021. *Hub Bound Travel Data Report 2019*. https://www.nymtc.org/Portals/0/Pdf/Hub%20Bound/2019%20Hub%20Bound/DM_TDS_Hub_Bound_Travel_2019.pdf?ver=GS5smEoyHSsHsyX_t_Zriw%3d%3d.

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It should be clarified that buses do not operate 24 hours a day. For BPC, there are no subway lines within BPC and the buses do not operate 24 hours. Please update the analysis.

New York City in cooperation with MTA, has included an extensive bus lane network throughout Manhattan and other boroughs to increase bus operating speeds and provide a degree of priority to buses over general traffic lanes.

NJ TRANSIT buses and private bus companies serve New Jersey counties in the regional study area. NJ TRANSIT operates an extensive network of commuter and local bus routes. Many commuter buses provide one-seat ride service between cities and towns in New Jersey and the Port Authority Bus Terminal in the Manhattan CBD, meaning travelers do not need to transfer between buses or from buses to trains to get to the Manhattan CBD. More than 65 NJ TRANSIT bus routes operate between New Jersey and the Port Authority Bus Terminal (PABT). While not every town in New Jersey has one-seat ride service to the Manhattan CBD, NJ TRANSIT provides bus service to all 14 New Jersey counties in the regional study area. Other private bus operators (e.g., Academy Bus Lines, Coach USA, and Trans-Bridge Bus Lines) operate between New Jersey communities within the regional study area (including park-and-ride lots), and either the PABT or curbside stops within the Manhattan CBD.

Limited bus connections are available from Long Island, New York counties north of New York City, and Connecticut to the Manhattan CBD. The Westchester County Department of Transportation's Bee-Line operates an express bus route to the Manhattan CBD from Westchester County. Coach USA operates commuter buses between towns in Rockland and Orange Counties, New York, and the PABT. Hampton Jitney is a private bus service between towns in eastern Long Island (Suffolk County, New York) and the Manhattan CBD. Other private bus operators offer limited operations between communities within the regional study area and either the PABT or curbside stops within the Manhattan CBD.

¹ the fall 2019, an average of 276,000 people entered and exited the Manhattan CBD by bus on average weekdays.¹²

4.2.5 Ferries

The following ferry operators, both privately owned and publicly owned, provide service to the Manhattan CBD from the other boroughs of New York City and waterfront communities in New Jersey:

- The New York City Economic Development Corporation owns NYC Ferry. The NYC Ferry service is a network of six ferry routes (with a seventh planned) that connects certain waterfront neighborhoods in the Bronx, Queens, Brooklyn, and Staten Island with various piers in the Manhattan CBD, including Wall Street, East 34th Street, and Midtown West at West 37th Street/Pier 79. There are also stops at Stuyvesant Cove (East River at East 20th Street) and Corlears Hook (East River at Jackson Street) within the Manhattan CBD, but only one ferry route serves each of these stops.

¹² New York Metropolitan Transportation Council. January 2021. *Hub Bound Travel Data Report 2019*. https://www.nymtc.org/Portals/0/Pdf/Hub%20Bound/2019%20Hub%20Bound/DM_TDS_Hub_Bound_Travel_2019.pdf?ver=GS5smEoyHSsHsyX_t_Zriw%3d%3d.

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We note that these are pre-COVID numbers and are no longer accurate. We ask that the analysis be updated to reflect the current statistics.

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- NYCDOT operates the Staten Island Ferry between the South Ferry Terminal in Lower Manhattan and the St. George Ferry Terminal in Staten Island.
- New York Waterway is a privately operated ferry system that operates service on multiple routes across the Hudson River between eight piers in Bergen and Hudson Counties in New Jersey and four piers in Midtown and Lower Manhattan.
- Seastreak is a privately owned ferry service that operates between East 34th Street and the Battery Maritime Building piers on the East River in the Manhattan CBD and either Atlantic Highlands or Sandy Hook Beach in Monmouth County, New Jersey.

1 the fall 2019, an average of 118,525 people entered and exited the Manhattan CBD via ferry service on average weekdays.¹³

4.2.6 Tram

The Roosevelt Island tram connects Roosevelt Island (an island in the East River between Queens and Manhattan) with Manhattan. The Manhattan terminus is located on Second Avenue between East 59th and East 60th Streets. The entire trip takes about 3 minutes, and the system transports more than 2 million passengers annually. The F subway line also provides service between Roosevelt Island and Manhattan.

4.3 BICYCLE AND PEDESTRIAN ACCESS TO THE MANHATTAN CBD

People may reach the Manhattan CBD on foot or by bicycle. The north–south avenues that cross 60th Street have sidewalks, and bicycle lanes are available on Amsterdam Avenue, Columbus Avenue, Central Park West, Second Avenue, and First Avenue. Shared-use bicycle and pedestrian paths are also along the Hudson and East Rivers. From Brooklyn and Queens, people may cross the Ed Koch Queensboro, Williamsburg, Manhattan, and Brooklyn Bridges by bicycle or on foot. There is no direct bicycle or pedestrian access between New Jersey and the Manhattan CBD as pedestrians are prohibited from the tunnel crossings.¹⁴

¹³ New York Metropolitan Transportation Council. January 2021. *Hub Bound Travel Data Report 2019*. https://www.nymtc.org/Portals/0/Pdf/Hub%20Bound/2019%20Hub%20Bound/DM_TDS_Hub_Bound_Travel_2019.pdf?ver=GS5smEoyHSsHsyX_t_Zriw%3d%3d.

¹⁴ Pedestrians and bicyclists are permitted to cross the George Washington Bridge and can reach the Manhattan CBD using the Hudson River Greenway or one of Manhattan’s north–south avenues.

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4A. Regional Transportation Effects and Modeling

4A.1 OVERVIEW AND CONTEXT

This subchapter describes the reasonably expected effects of implementing the CBD Tolling Alternative on the regional transport system, including travel demand and mode choice. It provides a description of the Best Practice Model (BPM)—the travel demand forecasting model that the New York Metropolitan Transportation Council (NYMTC) developed and maintains—and explains how the model was used to forecast the reasonably expected effects of the Project. The model results show changes in the region's travel characteristics, and specifically how trips would be made to, from, through, and around the Manhattan CBD, including any changes in the total number of trips, routes, and mode choice. The analysis of traffic impacts and mitigation, effects on transit usage, parking, pedestrians, and bicycle usage are based on outputs from these BPM forecasts, and they are evaluated in detail in other subchapters of **Chapter 4, "Transportation."**

4A.2 METHODOLOGY

This analysis is based on a compilation of existing travel characteristics and forecasts of changes in travel demand using the BPM, which is the primary tool used to analyze the effects of large-scale regional transportation projects including, the New York metropolitan area's Federally recognized Regional Transportation Plan, PANYNJ Bus Terminal Redesign, and New NY Bridge Project. The model has been adopted by NYMTC's member agencies for use in regional transportation planning analyses, and it is the Federally recognized transportation forecasting tool for the region. ¹Transportation findings from the BPM were augmented with information from academic studies and observed changes from similar cordon tolling programs in London, England, and Stockholm, Sweden. ¹

4A.2.1 ²Overview of Best Practice Model

The NYMTC version of the BPM used for this study was developed for NYMTC's 2017 Regional Transportation Plan and Federal air quality conformity determination. It includes the 28 counties that this EA uses for the study area (**Figure 4A-1**). NYMTC regularly updates and calibrates the BPM as part of its regional transportation planning responsibilities, including updating the model's demographic data, future employment and population projections, and changes in the underlying transportation network.

¹ London and Stockholm were chosen as comparative cities based on the scale and scope of their congestion charging programs. Congestion charging programs in these cities offer the most similarities to the proposed CBD Tolling Program. Additional cities in Europe and Asia (e.g., Milan [Italy] and Singapore) have congestion charging programs, but the programs in these cities differ in substantive ways from the proposed CBD Tolling Program. For example, the Milan program bans late-model high-pollution vehicles from the charging zone altogether. Social context is also important for comparative analysis where differing government and social norms may result in contrasting outcomes from a congestion charge.

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The only comparable city is London, the others are too small and not as densely populated. In London, residents of the zones receive a 90% upfront discount. Please update the analysis.



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How old is the data in the model? Is it pre-COVID as some of the other data? If so, we ask for updated data to be used in the model that is more reflective of the post-COVID environment.

various travelers in response to tolling. The assumptions that drive these sensitivities are described in **Appendix 4A.1, “Transportation: Section 4A.1-7. Value of Time.”**

4A.3 EVALUATING THE PROJECT

1 Results from the BPM for the No Action Alternative and the seven tolling scenarios were used to evaluate the effects of the CBD Tolling Alternative. This subchapter focuses on key findings from the BPM analysis and regional changes in travel behavior across the 28 counties included in the BPM (see **Figure 4A-1**). More detailed results on local roads, highways, local intersections, transit, bicycles, pedestrians, and parking are described and discussed in **Subchapter 4B through Subchapter 4E** across the 28-county region.

A detailed summary of the BPM outputs for the No Action Alternative and CBD Tolling Alternative (including the tolling scenarios) is provided in **Appendix 4A.2, “Transportation: Travel Forecast Tolling Scenario Summaries and Detailed Tables,”**. In all tables presented here, unless noted, the term “vehicle” in this chapter refers to all on-road vehicles, including single-occupancy vehicles, HOVs, motorcycles, taxis, FHV¹⁶, buses, and trucks.

Three metrics were used to summarize and compare the forecasts of the No Action Alternative and the CBD Tolling Alternative in this subchapter:

1. **Daily Vehicles Entering the Manhattan CBD:** This metric conveys the change in the number of vehicles that would cross into the Manhattan CBD as a result of the different tolling scenarios, and how those changes would vary geographically. **Table 4A-1, Table 4A-4, Table 4A-5, Table 4A-11, and Table 4A-12** report the number of vehicle crossings into the Manhattan CBD as described below:
 - New Jersey Crossings: Lincoln and Holland Tunnels
 - Brooklyn Crossings: Williamsburg, Manhattan, and Brooklyn Bridges and the Hugh L. Carey Tunnel
 - Queens Crossings: Ed Koch Queensboro Bridge¹⁷ and Queens-Midtown Tunnel
 - 60th Street Crossings in Manhattan (divided into three groupings):
 - East Side avenues
 - West Side avenues
 - Franklin D. Roosevelt (FDR) Drive and the West Side Highway/Route 9A (combined volumes)¹⁸

¹⁶ Since the BPM does not distinguish between taxis and FHV¹⁶, taxi and FHV maximum CBD toll rates were blended to evaluate policy differences in tolling. **Appendix 4A.1, “Transportation: Implementation of Tolls in the Best Practice Model,”** provides a more detailed discussion of modeling taxi and FHV travel.

¹⁷ The Manhattan-bound upper ramp of the Queensboro Bridge is considered part of the Queens-inbound crossing locations to the Manhattan CBD, and it is also reported in the 60th Street outbound crossing locations. Currently, all Manhattan-bound traffic enters the bridge via the northern upper-level lanes of the Ed Koch Queensboro Bridge and enters the Manhattan CBD but immediately exits the Manhattan CBD on the northbound ramp to 62nd Street (except for AM peak-period HOV lanes that use the southern lanes, typically reserved for outbound traffic, which enter the Manhattan CBD at 59th Street). The Queensboro Bridge entrances and exits are consistent with the NYMTC *Hub Bound Travel Data Report*. All traffic using the northern upper roadway of the Ed Koch Queensboro Bridge to access Manhattan north of 60th Street would not be subject to CBD tolling in the tolling scenarios modeled in this EA.

¹⁸ Vehicles traveling south of 60th Street on the West Side Highway/Route 9A and the FDR Drive would not be charged a CBD toll if they remain on these roadways and do not enter the Manhattan CBD.

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The model is missing the displacement rate forecast. Charging residents an addition ~\$5k/year will easily end up with a 5% displacement for various reasons. At 5% of registered vehicle owners in the CBD (~75,000), the likely losses to state and local income tax might exceed the entirety of funds gained by imposing CBD tolling on the residents. Please consider as part of the analysis.

2. **Daily VMT:** The analysis conveys the change in the aggregate level of driving or traffic that would occur within the BPM's modeled area. **Table 4A-2, Table 4A-6, Table 4A-7, Table 4A-13, and Table 4A-14** report the quantity of VMT (i.e., total miles traveled by vehicles) forecast in each reporting area. Changes in VMT are correlated with changes in level of service, air quality, and noise discussed in **Subchapter 4B, "Highways and Local Intersections," Chapter 10, "Air Quality," and Chapter 12, "Noise."**

Figure 4A-2 displays the reporting subareas used within New York City (NYC Subareas 1, 2, and 3). The subareas are defined based on their proximity to the Manhattan CBD entry and exit locations. The Manhattan CBD comprises the surface streets within the CBD, referred to below as the CBD Core and the highways that circumnavigate the surface streets, referred to as the Peripheral Highways. The Peripheral Highways include:

- West Side Highway/Route 9A south of 60th Street
- FDR Drive south of 60th Street, including the Battery Park Underpass
- Lincoln, Holland, Hugh L. Carey, and Queens-Midtown Tunnels
- Brooklyn, Manhattan, Williamsburg, and Ed Koch Queensboro Bridges

Outside New York City, VMT is reported for the remaining seven New York counties that are inside the BPM boundary: Nassau County and Suffolk County on Long Island and five counties to the north of New York City (Dutchess, Orange, Putnam, Rockland, and Westchester). In Connecticut, VMT is reported for Fairfield and New Haven Counties. In New Jersey, VMT is reported for the 14 northeastern counties. (See **Figure 4A-1** for a map of the 28 counties in the BPM.)

3. **Mode Shares for Manhattan CBD-Related Person-Journeys.** The analysis conveys the share of journeys that would be made by transit, auto, and nonmotorized (walk and bike) travel modes related to the Manhattan CBD. Manhattan CBD-related journeys are those with one or both ends of the journey inside the Manhattan CBD. These metrics are reported in **Table 4A-3, Table 4A-8, and Table 4A-15.**

Table 4A-8 and Table 4A-15 report changes in the percentage share of transit, *auto, and nonmotorized* journeys that would originate outside and travel into the Manhattan CBD; journeys that would originate inside and travel out of the Manhattan CBD; and journeys that would be completely internal to the Manhattan CBD. Transit share reported is the number of people who would make a transit journey—including via subway, commuter rail, buses, ferries, and trams—as a percentage of people who would travel by all motorized vehicles and nonmotorized modes such as walking and biking.

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Is there a breakdown by class of vehicle regarding VMT? Please include in analysis.

4A.4 ENVIRONMENTAL CONSEQUENCES

4A.4.1 No Action Alternative

This section presents the predicted changes in regional travel patterns between the opening year (2023) and the horizon year (2045) for the No Action Alternative. The 2023 and 2045 transportation networks for the No Action Alternative include the planned improvements documented in the Regional Transportation Plan, adopted in June 2017.¹⁹ Additional network updates (described in **Appendix 4A.1, “Transportation: Implementation of Tolls in the Best Practice Model,” Table 4A.1-3**) were implemented to reflect existing conditions as of September 2021.²⁰ Land use, population, and employment assumptions come from the NYMTC Socioeconomic and Demographic Forecasts. NYMTC routinely develops these forecasts for the region, which include population, households, employment, and labor force projections.

¹With these assumptions, BPM-generated forecasts show a 4.8 percent increase (about 0.25 percent per year) in daily vehicles entering the Manhattan CBD (**Table 4A-1**) between 2023 and 2045. The largest absolute increase would occur on the 60th Street crossings, with an additional 12,410 vehicle trips.

Table 4A-1. Forecast Growth in Daily Vehicles Entering the Manhattan CBD: No Action Alternative

CROSSING LOCATIONS	OPENING YEAR (2023)	HORIZON YEAR (2045)	DIFFERENCE	PERCENTAGE CHANGE
60th Street	276,466	288,876	12,410	4.5%
FDR Drive and West Side Highway/Route 9A ¹	161,696	168,499	6,803	4.2%
West Side Avenues	28,026	31,920	3,894	13.9%
East Side Avenues ²	86,744	88,457	1,713	2.0%
Queens	142,596	154,348	11,752	8.2%
Brooklyn	187,486	192,604	5,118	2.7%
New Jersey	109,602	114,867	5,265	4.8%
TOTAL	716,150	750,695	34,545	4.8%

¹ Vehicle volumes entering the Manhattan CBD reported in this table for the FDR Drive and the West Side Highway/Route 9A and are all vehicles traveling south on these facilities at 60th Street regardless of whether the vehicle eventually enters the Manhattan CBD from one of these facilities. Some vehicles reported in this table may use the FDR Drive and the West Side Highway/Route 9A to access the Hugh L. Carey Tunnel or Brooklyn Bridge without ever entering the Manhattan CBD. The volumes here are reported in this manner to be consistent with counts published in the annual NYMTC *Hub Bound Travel Data Report*.

² The larger volumes in East Side avenues result from some Queensboro Bridge traffic being counted twice. The NYMTC *Hub Bound Travel Data Report* cordon includes the upper inbound roadway as a Manhattan CBD outbound tolling zone boundary. Any traffic that would then circle back into the Manhattan CBD via Second Avenue or York Avenue would be recounted as a Manhattan CBD inbound trip.

¹⁹ New York Metropolitan Transportation Council. June 2017. *Plan 2045: Maintaining the Vision for a Sustainable Region*.

²⁰ Modeling of tolling scenarios commenced on September 2021; therefore, any road network changes since then are not included in this analysis.

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Where is the historic data to support this extrapolation? Please update.

Table 4A-2. **1** Recast Growth in All Vehicle Daily Vehicle-Miles Traveled: No Action Alternative

LOCATION	OPENING YEAR (2023)	HORIZON YEAR (2045)	GROWTH FROM 2023 TO 2045	PERCENTAGE CHANGE
New York Counties	122,186,497	134,186,361	11,999,864	9.8%
New York City	47,131,752	49,748,914	2,617,162	5.6%
2 Manhattan CBD	3,244,791	3,402,711	157,920	4.9%
CBD Core	1,217,727	1,262,019	44,292	3.6%
Peripheral Highways (south of 60th Street; excluded from the toll)	2,027,064	2,140,692	113,628	5.6%
West Side Highway/Route 9A	610,657	647,671	37,014	6.1%
FDR Drive	720,682	758,659	37,977	5.3%
Bridges and Tunnels*	695,725	734,362	38,637	5.6%
NYC Subarea 1 (see Figure 4A-2)	2,218,077	2,349,929	131,852	5.9%
NYC Subarea 2 (see Figure 4A-2)	6,660,953	7,142,863	481,910	7.2%
NYC Subarea 3 (see Figure 4A-2)	35,007,931	36,853,411	1,845,480	5.3%
Long Island Counties (2)	41,585,545	46,813,526	5,227,981	12.6%
New York Counties North of New York City (5)	33,469,200	37,623,921	4,154,721	12.4%
New Jersey Counties (14)	97,578,100	107,907,842	10,329,742	10.6%
Connecticut Counties (2)	34,909,870	35,063,470	153,600	0.4%
TOTAL	254,674,467	277,157,673	22,483,206	8.8%

Note: The number of counties are indicated within parentheses ().

* Bridge and tunnel traffic includes VMT from the portion of bridges and tunnels in New York County (Manhattan) entering the Manhattan CBD from Kings County (Brooklyn), Queens, and New Jersey.

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What is historic data series and what vehicle class is used? Please clarify.



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This data appears to contradict table 4A-3. Can you please clarify?

Table 4A-3. **1** Changes in Manhattan CBD Total Daily Mode Share: No Action Alternative

DIRECTION OF JOURNEY	OPENING YEAR (2023)	HORIZON YEAR (2045)	PERCENTAGE POINT CHANGE
Journeys Beginning Outside the Manhattan CBD	1,920,016	2,056,665	
Auto (including HOV, Taxi, FHV)	19.1%	17.7%	-1.4%
Transit	78.2%	79.7%	1.5%
Walk and Bike	2.7%	2.6%	-0.1%
Journeys Beginning Inside the Manhattan CBD	159,183	173,345	
Auto (including HOV, Taxi, FHV)	30.2%	29.7%	-0.5%
Transit	51.5%	52.1%	0.6%
Walk and Bike	18.3%	18.2%	-0.1%
Journeys Within the Manhattan CBD	875,418	916,741	
Auto (including HOV, Taxi, FHV)	7.1%	6.9%	-0.2%
Transit	27.5%	27.4%	-0.1%
Walk and Bike	65.4%	65.7%	0.3%
All Manhattan CBD-Related Journeys	2,954,617	3,146,751	
Auto (including HOV, Taxi, FHV)	16.2%	15.3%	-0.9%
Transit	61.7%	62.9%	1.2%
Walk and Bike	22.1%	21.8%	-0.3%

Note: Trucks are excluded from mode share calculations

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This seems to indicate that, with no action, there will be a decrease in vehicle traffic? Please clarify.

Central Business District (CBD) Tolling Program Environmental Assessment

Subchapter 4A, Transportation: Regional Transportation Effects and Modeling

Table 4A-6. Daily Vehicle-Miles Traveled: No Action Alternative and CBD Tolling Alternative, by Tolling Scenario (2023)

LOCATIONS	NO ACTION	SCENARIO A	SCENARIO B	SCENARIO C	SCENARIO D	SCENARIO E	SCENARIO F	SCENARIO G
New York Counties	122,186,497	121,752,302	121,789,089	121,438,634	121,227,956	121,111,122	121,464,091	121,662,622
New York City	47,131,752	46,743,670	46,784,237	46,572,720	46,461,121	46,404,913	46,578,412	46,713,541
1 Manhattan CBD	3,244,791	2,993,214	2,998,489	2,984,080	2,963,211	2,946,339	3,016,013	2,970,819
CBD Core	1,217,727	1,150,843	1,152,471	1,161,407	1,159,162	1,147,545	1,183,476	1,142,077
Peripheral Highways (south of 60th Street; excluded from the toll)	2,027,064	1,842,371	1,846,018	1,822,673	1,804,049	1,798,794	1,832,537	1,828,742
West Side Highway/Route 9A	610,657	510,785	513,887	493,396	485,167	486,404	501,603	508,951
FDR Drive	720,682	725,459	729,706	718,820	705,903	710,555	721,421	727,101
Bridges & Tunnels	695,725	606,127	602,425	610,457	612,979	601,835	609,513	592,690
NYC Subarea 1 (see Figure 4A-2)	2,218,077	2,049,561	2,049,528	2,004,366	1,955,714	1,944,168	1,962,310	2,031,243
NYC Subarea 2 (see Figure 4A-2)	6,660,953	6,626,001	6,630,016	6,588,313	6,578,676	6,568,162	6,596,549	6,615,308
NYC Subarea 3 (see Figure 4A-2)	35,007,931	35,074,894	35,106,204	34,995,961	34,963,520	34,946,244	35,003,540	35,096,171
Long Island Counties (2)	41,585,545	41,609,407	41,595,736	41,546,248	41,503,705	41,497,676	41,598,789	41,573,420
New York Counties North of New York City (5)	33,469,200	33,399,225	33,409,116	33,319,666	33,263,130	33,208,533	33,286,890	33,375,661
New Jersey Counties (14)	97,578,100	97,594,939	97,590,826	97,748,567	97,733,034	97,665,181	97,768,338	97,642,310
Connecticut Counties (2)	34,909,870	34,878,673	34,856,848	34,830,279	34,846,493	34,842,671	34,893,239	34,844,682
TOTAL	254,674,467	254,225,914	254,236,763	254,017,480	253,807,483	253,618,974	254,125,668	254,149,614

Notes:

1. The number of counties are indicated within parentheses ().
2. Unless noted, the terms "Vehicle-Miles Traveled" or "VMT" in this subchapter refer to miles traveled by all on-road vehicles, including single-occupancy vehicles, HOVs, motorcycles, taxis, FHVs, buses, and trucks.

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How does an 8% reduction align with the cause of congestion when the earlier metrics showed that the issue was with trucks alone and not cars? Please clarify.

Central Business District (CBD) Tolling Program Environmental Assessment

Subchapter 4A, Transportation: Regional Transportation Effects and Modeling

Table 4A-8. Daily Manhattan CBD Journey Mode Share (compared to No Action Alternative) by Tolling Scenario (2023)

DIRECTION OF JOURNEY	NO ACTION	SCENARIO A	SCENARIO B	SCENARIO C	SCENARIO D	SCENARIO E	SCENARIO F	SCENARIO G
Beginning Outside the Manhattan CBD								
Auto (including HOV, Taxi, FHV)	19.1%	18.0%	18.1%	17.7%	17.0%	16.8%	17.3%	17.7%
Transit	78.2%	79.3%	79.2%	79.6%	80.3%	80.5%	80.0%	79.6%
Walk and Bike	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%
Change in Transit Share		1.1%	1.0%	1.4%	2.1%	2.3%	1.8%	1.4%
Beginning Inside the Manhattan CBD								
1 to (including HOV, Taxi, FHV)	30.2%	28.9%	29.0%	28.5%	27.6%	27.6%	28.2%	27.9%
Transit	51.5%	52.4%	52.3%	52.6%	53.4%	53.4%	52.9%	53.6%
Walk and Bike	18.3%	18.7%	18.7%	18.9%	19.0%	19.0%	18.9%	18.5%
Change in Transit Share		0.9%	0.8%	1.1%	1.9%	1.9%	1.4%	2.1%
Beginning and Ending Within the Manhattan CBD								
Auto (including HOV, Taxi, FHV)	7.1%	7.1%	7.2%	7.2%	7.2%	7.1%	7.1%	7.3%
Transit	27.5%	27.5%	27.3%	27.5%	27.6%	27.6%	27.5%	27.7%
Walk and Bike	65.4%	65.4%	65.5%	65.3%	65.2%	65.3%	65.4%	65.0%
Change in Transit Share		0.0%	-0.2%	0.0%	0.1%	0.1%	0.0%	0.2%
All Manhattan CBD-Related Journeys								
Auto (including HOV, Taxi, FHV)	16.2%	15.3%	15.5%	15.1%	14.6%	14.5%	14.9%	15.1%
Transit	61.7%	62.5%	62.4%	62.7%	63.2%	63.3%	63.0%	62.8%
Walk and Bike	22.1%	22.2%	22.1%	22.2%	22.2%	22.2%	22.1%	22.1%
Change in Transit Share		0.8%	0.7%	1.0%	1.5%	1.6%	1.3%	1.1%

Note: Table includes only journeys made by single-occupancy vehicles, HOVs, taxis, FHVs, motorcycles, public transit, bicycle, and walking, but does not include commercial trucks.

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This is inconsistent with 4A-2. Please clarify.

4A.4.4 CBD Tolling Alternative Tolling Scenario Summaries

All tolling scenarios within the CBD Tolling Alternative would result in travel pattern changes that would support congestion relief: reduced automobile and truck trips to the Manhattan CBD, reduced VMT to and within the Manhattan CBD and regionally, and a shift from auto trips to transit.²² Percentage reductions in 2023 vehicle trips entering the Manhattan CBD range from 15.4 percent (Tolling Scenario A) to 19.9 percent (Tolling Scenario E; see **Table 4A-5**). As summarized in **Chapter 2, “Project Alternatives,”** the primary differences revolve around the magnitude and the distribution of the reductions resulting from the toll rates and potential crossing credits, which vary by tolling scenario. **Appendix 4A.2, “Transportation: Travel Forecast Tolling Scenario Summaries and Detailed Tables,”** describes the opening year (2023) travel pattern changes for each tolling scenario followed by horizon year (2045) travel pattern changes for each tolling scenario compared to the No Action Alternative, and also provides details for both the 2023 and 2045 results. While the results of the 2045 model runs are different in terms of actual numbers (because they reflect the longer-term background growth in the model’s forecast), the patterns from tolling scenario to tolling scenario are consistent between 2023 and 2045.

4A.4.5 Key Findings

The BPM assessment of regional travel demand and trip characteristics shows that implementing the CBD Tolling Alternative would reduce vehicular traffic within the Manhattan CBD compared to the No Action Alternative in all tolling scenarios analyzed. Based on the BPM, which looks at the time and cost associated with a trip-making decision, the imposition of a Manhattan CBD toll would reduce the number of vehicles entering the Manhattan CBD compared to the No Action Alternative for both the 2023 and the longer-term 2045 analysis years.

With the CBD Tolling Alternative, total regional VMT and vehicle-hours traveled would be reduced. The largest changes would occur in the Manhattan CBD and would diminish farther away from the Manhattan CBD. Roughly three-quarters of the auto-trip reductions into and through the Manhattan CBD would result from travelers avoiding the Manhattan CBD for through-trips (e.g., Jersey City to Brooklyn). These trips either would switch modes or, more often, would find alternative paths around the Manhattan CBD. Other auto-trip reductions would result from people switching modes for trips into the Manhattan CBD. Modeling of the CBD Tolling Alternative indicates that drivers would have three basic ways to avoid paying the Manhattan CBD toll:

- Switch to another mode such as transit.
- **1 Choose a new and different path to avoid the Manhattan CBD for vehicular through-trips.**
- Choose not to make the trip to the Manhattan CBD.

²² Buses on the roadways are included in the calculation of volumes and VMT. However, the number of buses reflects the No Action Alternative and does not vary between the No Action Alternative and CBD Tolling Alternative. This is because the model does not include additional buses that may be needed to serve increased transit demand. **Subchapter 4C, “Transportation: Transit”** provides an analysis of transit demand.

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While the information provided is contradictory, if restricting travel to the FDR and West Side Highway is avoiding the CBD, then increased through traffic will be observed. Please clarify.

BROOKLYN BRIDGE AND HUGH L. CAREY TUNNEL

The Brooklyn Bridge and Hugh L. Carey Tunnel would provide access across the East River to and from the FDR Drive and the West Side Highway/Route 9A that would not be subject to the Manhattan CBD toll. The Battery Park Underpass is not tolled and would not be tolled in the future, and therefore offers an untolled connection between the FDR Drive and the West Side Highway/Route 9A around the southern edge of Manhattan.

These Manhattan CBD toll exemptions for the Hugh L. Carey Tunnel ramps to the West Side Highway/Route 9A and Brooklyn Bridge ramps to the FDR Drive would provide a toll-free route around the Manhattan CBD to and from Brooklyn. Traffic from the Hugh L. Carey Tunnel and Brooklyn Bridge directly accessing Manhattan CBD streets would pay the Manhattan CBD toll. For all tolling scenarios, the total number of vehicles using the Brooklyn Bridge toward Manhattan would decrease, but volumes on the ramp connecting Manhattan-bound bridge traffic to the FDR Drive would increase (Table 4A-20). Tolling scenarios that provide crossing credits on TBTA facilities into the Manhattan CBD would subdue these increases, because crossing credits would increase the relative attractiveness of using TBTA tunnels.

Table 4A-20. Brooklyn Bridge Average Weekday Vehicle Volumes (Manhattan-Bound): No Action Alternative and Tolling Scenarios

DIRECTION	NO ACTION	SCENARIO A	SCENARIO B	SCENARIO C	SCENARIO D	SCENARIO E	SCENARIO F	SCENARIO G
Manhattan-Bound								
Main Span	58,976	55,180	54,883	50,181	45,361	44,995	44,691	55,096
Ramp to FDR Drive	39,415	44,690	44,718	44,293	42,337	42,155	41,830	45,270
Ramps to Manhattan CBD	19,164	10,091	9,767	5,491	2,626	2,442	2,463	9,428
Manhattan-Bound (Difference from No Action Alternative)								
Main Span	—	-3,796	-4,093	-8,795	-13,615	-13,981	-14,285	-3,880
Ramp to FDR Drive	—	5,275	5,303	4,878	2,922	2,740	2,415	5,855
Ramps to Manhattan CBD	—	-9,073	-9,397	-13,673	-16,538	-16,722	-16,701	-9,736

Note: Volumes in this table are results directly from the BPM. Subchapter 4B, "Transportation: Highways and Local Intersections," includes more detailed traffic engineering analysis with additional bridge capacity and operational restrictions, which are beyond the scope of regional analysis considered by the BPM.

Manhattan-bound volumes in the Hugh L. Carey Tunnel would increase for all tolling scenarios. For Tolling Scenario A and Tolling Scenario B, volume increases would result from increased demand ¹ West Street and the FDR Drive via the Battery Park Underpass (Table 4A-21). This connection would not be subject to the Manhattan CBD toll in any of the tolling scenarios. For Tolling Scenarios C, D, E and F, use of the tunnel would also increase in response to the crossing credits for the TBTA tunnel toll. In these tolling scenarios, the increase in traffic would be derived from travelers diverted by the advantage of Manhattan CBD crossing credits offered by using the Hugh L. Carey Tunnel to access the Manhattan CBD.

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This reflects that the Battery Park Underpass would not be subject to the CBD toll. Please clarify the basis of how this was decided.

Table 4A-21. Hugh L. Carey Tunnel Average Weekday Vehicle Volumes (Manhattan-Bound): No Action Alternative and Tolling Scenarios

DIRECTION	NO ACTION	SCENARIO A	SCENARIO B	SCENARIO C	SCENARIO D	SCENARIO E	SCENARIO F	SCENARIO G
Manhattan-Bound								
Volume	31,063	31,785	32,061	41,122	51,087	51,369	50,962	31,580
Manhattan-Bound (Difference from No Action Alternative)								
Volume	—	722	998	10,059	20,025	20,306	19,900	517

Note: Volumes in this table are results directly from the BPM. **Subchapter 4B, "Transportation: Highways and Local Intersections,"** includes more detailed traffic engineering analysis with additional tunnel capacity and operational restrictions, which are beyond the scope of regional analysis considered by the BPM.

TRUCK TRIPS

BPM analysis of truck trips assumed that deliveries would still be made to restaurants, businesses, and residents regardless of Project implementation. The BPM assumed that trip origins and destinations of trucks and other commercial vehicles would remain consistent across all the tolling scenarios. As a result, all modeled reductions in trucks into the Manhattan CBD would result from through-trips diverting around the Manhattan CBD, balancing increased cost to access the Manhattan CBD and increased travel times to avoid the Manhattan CBD. The BPM analysis also assumed that trucks would use only valid truck routes.

The model estimates a reduction in trucks through the Manhattan CBD ranging from approximately 1,700 trucks in Tolling Scenario G to nearly 6,800 trucks in Tolling Scenario F compared to the No Action Alternative (**Table 4A-22**). Tolling Scenario F would have the highest tolls for trucks entering the Manhattan CBD.

Table 4A-22. Average Daily Truck Trips through the Manhattan CBD: No Action Alternative and Tolling Scenarios

	NO ACTION	SCENARIO A	SCENARIO B	SCENARIO C	SCENARIO D	SCENARIO E	SCENARIO F	SCENARIO G
Truck Trips Through Manhattan CBD	8,392	3,746	3,424	3,139	2,705	1,788	1,607	6,657
Difference	—	-4,645	-4,967	-5,253	-5,687	-6,604	-6,784	-1,734

In addition to the BPM analysis, an assessment of truck travel changes from the congestion pricing programs in London and Stockholm were reviewed, along with findings from academic research on the propensity of shippers to switch toward overnight (or lower-toll period) deliveries once the Project is under way. Most importantly, the London and Stockholm post-implementation studies suggest that truck delivery companies continue to deliver their goods regardless of a congestion pricing program. Commercial stores still need their goods delivered. In some instances when reduced congestion in the core could improve travel times, some truck companies switched their deliveries into the peak period to deliver their goods.

For example, the congestion pricing program trial in Stockholm resulted in more truck deliveries in the middle of the day between commuting peak hours. Stockholm truck distribution companies were surveyed,

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How is this data collected and modeled? Can you please clarify? Are there truly only 8,392 trucks or is this a special case of only trucks traveling "through" and not within?

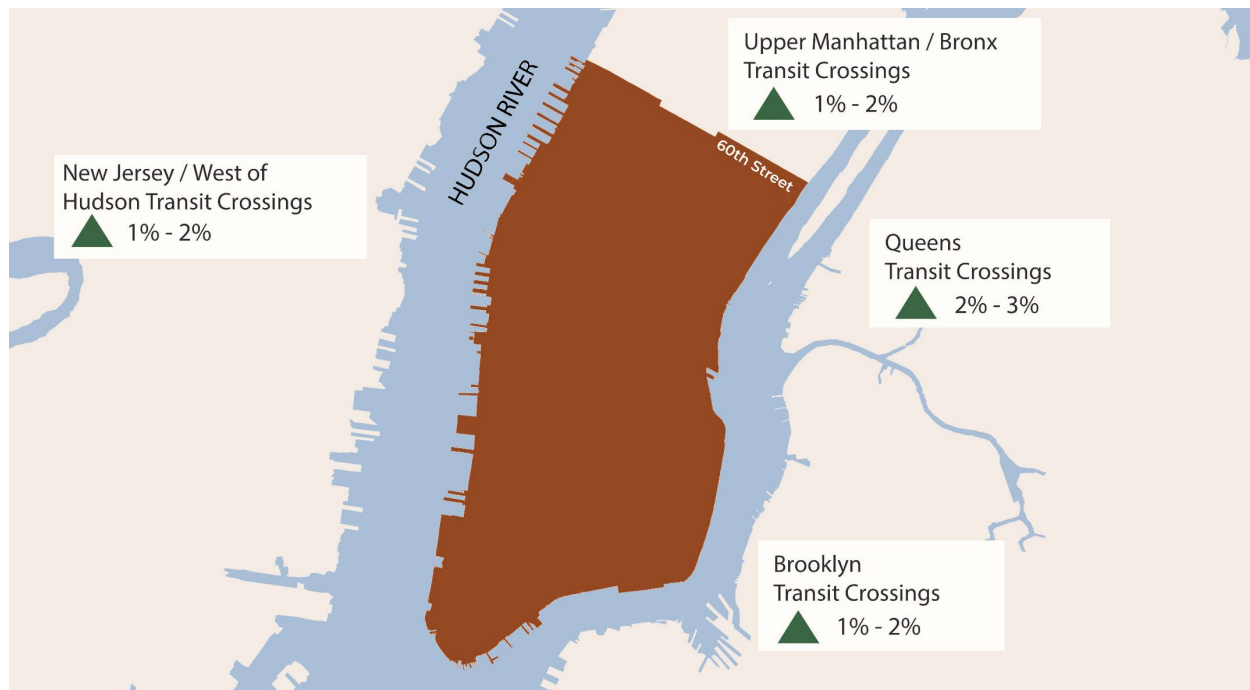


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Earlier the proposal opted against time-based and against truck-based solutions. The reference here to other implementations and how the trucks adapted does not correlate with the earlier conclusions. Please clarify.

While **Table 4A-8** shows a more aggregate change in transit activity, **Figure 4A-4** shows a more detailed picture of the changes in transit trips (crossings) into the Manhattan CBD from different locations outside of the Manhattan CBD. All tolling scenarios would lead to an increase in transit trips from each location shown in the map.

Figure 4A-4. Change in Transit Crossings into the Manhattan CBD



Source: BPM, range of results across all tolling scenarios

DIVERSIONS TO OTHER ROUTES

With the CBD Tolling Alternative, some people who previously traveled through the Manhattan CBD in vehicle or truck would choose a different path to avoid the Manhattan CBD altogether. For example, a person traveling by car from Caldwell, New Jersey, to Lincoln Center in Manhattan typically uses the Lincoln Tunnel between New Jersey and New York. Under some of the tolling scenarios, that same person would likely choose to reroute across the George Washington Bridge to avoid the Manhattan CBD toll. Between 72 percent and 82 percent of the total traffic reductions in the Manhattan CBD would be from through-trips finding other paths that do not include the Manhattan CBD.

In addition, some drivers who would continue to drive to the Manhattan CBD would choose a different route based on the introduction of Manhattan CBD crossing credits. In tolling scenarios with crossing credits, some drivers would choose more direct paths using free or reduced crossing credits when the cost of the toll is crossing-credited against their CBD toll, thereby minimizing the cost differential of traffic on East River crossings. **Subchapter 4B, "Transportation: Highways and Local Intersections,"** examines these specific highway- and intersection-based consequences and potential impacts of the CBD Tolling Alternative.

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This language indicates a diversion through other parts of New York. This means movement of emissions from part of NY to another part that is already congested. This seems to contradict the purpose of the CBD. Please clarify.

Table 4A-25. Staten Island Daily Vehicle-Miles Traveled by Roadway Type (2023): No Action Alternative and Tolling Scenarios

	NO ACTION	SCENARIO A	SCENARIO B	SCENARIO C	SCENARIO D	SCENARIO E	SCENARIO F	SCENARIO G
Staten Island Vehicle-Miles Traveled								
All Roads	3,986,457	4,071,056	4,078,180	4,078,984	4,076,004	4,085,745	4,080,603	4,098,571
Highways	1,954,370	2,032,359	2,037,322	2,038,405	2,031,673	2,040,204	2,033,669	2,052,174
Local Streets	1,848,897	1,851,808	1,853,295	1,853,460	1,856,424	1,857,188	1,859,385	1,858,658
Ramps	183,191	186,890	187,563	187,119	187,907	188,354	187,549	187,739
Staten Island Vehicle-Miles Traveled (Difference from No Action Alternative)								
All Roads	—	84,598	91,723	92,526	89,547	99,288	94,145	112,113
Highways	—	77,988	82,952	84,035	77,303	85,834	79,299	97,804
Local Streets	—	2,911	4,398	4,563	7,527	8,291	10,488	9,762
Ramps	—	3,699	4,372	3,928	4,716	5,163	4,358	4,548

Table 4A-26. Staten Island Daily Vehicle-Miles Traveled on Highways by Vehicle Type (2023): No Action Alternative and Tolling Scenarios

	NO ACTION	SCENARIO A	SCENARIO B	SCENARIO C	SCENARIO D	SCENARIO E	SCENARIO F	SCENARIO G
Staten Island Highway Vehicle-Miles Traveled								
1 Personal Vehicle	1,784,013	1,863,248	1,866,725	1,867,229	1,859,509	1,867,296	1,862,611	1,885,233
Taxi/FHV/ Commercial Van	54,327	49,048	49,105	49,358	50,283	48,622	49,341	49,767
Commercial Truck	110,041	114,074	115,505	115,830	115,893	118,298	115,729	111,186
Bus	5,988	5,988	5,988	5,988	5,988	5,988	5,988	5,988
Staten Island Highway Vehicle-Miles Traveled (Difference from No Action Alternative)								
Personal Vehicle	—	79,235	82,711	83,216	75,496	83,283	78,598	101,220
Taxi/FHV/ Commercial Van	—	-5,279	-5,223	-4,969	-4,044	-5,705	-4,986	-4,560
Commercial Truck	—	4,033	5,464	5,789	5,852	8,257	5,687	1,144
Bus*	—	*	*	*	*	*	*	*

* In the BPM, all buses (e.g., MTA NYCT, MTA Bus Company, NJ TRANSIT and private operators) were considered insensitive to Manhattan CBD tolling, because such buses were assigned a fixed route and headway based on existing or planned service. Transit vehicles in the model were not allowed to deviate from those routes or headways based on tolls or congestion. Therefore, bus volumes are the same across tolling scenarios.

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This will cause more net pollution and pressure on energy markets. Please clarify.

TRIP SUPPRESSION

Trip suppression is a trip to the Manhattan CBD that would be “canceled” as a result of the Project. The trip would either no longer take place or divert to a different destination outside of the Manhattan CBD. These types of trips are different from trips that switch modes from driving to transit as discussed earlier in this chapter. The BPM includes explicit representations of destination change and mode choice; however, the BPM has a limited accounting for the third and smallest type of trip suppression (i.e., trip cancellation).

It is anticipated that some trips would be canceled due to the implementation of the Project based on similar program implementations in London and Stockholm. In those implementations, there is a strong relationship between trip cancellation and congestion pricing programs, although the available data varies between London and Stockholm. Of the available data, the trends in London and Stockholm similarly show that the implementation of congestion pricing programs are effective in reducing car traffic and suppressing trips to a CBD. After one year of implementing congestion pricing in Central London in February 2003, the number of vehicles entering the Central London CBD charging zone decreased by 18 percent, and there was an average daily decrease of approximately 60,000 trips made to the Central London CBD. Of these 60,000 trips, approximately 50 percent switched to public transit, approximately 20 percent of trips avoided the Central London CBD charging zone, roughly 15 percent switched to car share, and the remaining 15 percent of trips were assumed to be suppressed. In 2020, the program charged a flat weekday fee of £15 (around ¹20.25) when entering the zone between 7:00 a.m. and 10:00 p.m.

Similarly, after a six-month trial, Stockholm saw a 22 percent decrease in car traffic entering the Stockholm CBD charging zone between 2005 and 2006. Less than 50 percent of car users who stopped commuting into the Stockholm CBD charging zone switched to transit. It can be inferred that the remaining 50 percent or so of trips that were no longer made to the Stockholm CBD were suppressed, transferred to car share, routed elsewhere outside the Stockholm CBD, or switched to take place outside of tolling hours. The Stockholm CBD charges were effective weekdays from 6:30 a.m. to 6:30 p.m., and the price was set at 10 SEK to 20 SEK (US \$1.33 to \$2.67 at 2006 rates) for off-peak and peak periods.

TAXIS AND FHVS

The tolling scenarios test a variety of tolling policies for taxis and FHVs ranging from charging a toll each time a taxi or FHV enters the Manhattan CBD to a complete exemption from paying the CBD toll. **Table 4A-33** provides an overview of the CBD tolling policy for taxis and FHVs in each tolling scenario. ²he CBD tolls would be collected in addition to the New York State Congestion Surcharge²⁹ of \$2.50 and \$2.75 for taxis and FHVs, respectively, for trips that start, end, or pass through the congestion surcharge zone—Manhattan south of 96th Street.

²⁹ Congestion Surcharge. New York City Taxi & Limousine Commission. December 25, 2021. <https://www1.nyc.gov/site/tlc/about/congestion-surcharge.page>.

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Due to changes in exchange rates, this is no longer accurate. The exchange rate is closer to \$18.86. Please update.



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It appears this is a double charge. Is this the intent? Seems more efficient to have one charge rather than a second charge covering the same issue. Please clarify.

Table 4A-34. Projected Percentage of Total Revenue/Percentage of Total Trips

GEOGRAPHY	SCENARIO A	SCENARIO B	SCENARIO C	SCENARIO D	SCENARIO E	SCENARIO F	SCENARIO G
New York (Manhattan)	13.5% / 14.0%	13.0% / 13.5%	15.7% / 13.6%	16.6% / 12.5%	17.9% / 12.4%	20.0% / 12.5%	13.1% / 13.5%
Kings (Brooklyn)	19.0% / 17.9%	18.9% / 17.8%	20.3% / 18.7%	17.1% / 16.5%	17.1% / 16.7%	17.5% / 16.5%	19.1% / 18.0%
Queens	17.9% / 16.4%	18.1% / 16.6%	17.7% / 17.6%	15.8% / 16.4%	16.6% / 16.5%	16.4% / 16.1%	18.2% / 16.7%
Bronx	6.2% / 6.6%	6.2% / 6.7%	7.9% / 7.1%	9.9% / 6.6%	9.1% / 6.6%	10.2% / 6.6%	6.3% / 6.8%
Richmond (Staten Island)	1.6% / 1.6%	1.6% / 1.5%	1.7% / 1.8%	1.1% / 1.7%	1.4% / 1.8%	1.4% / 1.7%	1.6% / 1.6%
Long Island	7.6% / 6.8%	7.7% / 6.9%	7.2% / 7.0%	6.3% / 6.7%	6.8% / 6.8%	6.3% / 6.6%	7.7% / 6.9%
Hudson Valley	6.6% / 7.1%	6.6% / 7.2%	8.4% / 7.7%	10.4% / 7.1%	9.4% / 7.1%	10.8% / 7.2%	6.6% / 7.1%
New Jersey	17.7% / 20.0%	17.8% / 20.0%	11.6% / 16.5%	10.0% / 21.9%	11.8% / 21.4%	7.8% / 21.9%	17.5% / 19.6%
Connecticut	2.4% / 2.5%	2.4% / 2.6%	3.1% / 2.8%	4.0% / 2.6%	3.5% / 2.5%	4.1% / 2.6%	2.4% / 2.6%
Other	7.5% / 7.2%	7.5% / 7.3%	6.4% / 7.1%	5.8% / 8.1%	6.5% / 8.4%	5.5% / 8.3%	7.4% / 7.2%

Note: *Revenue* includes only projected CBD toll revenue. Other existing TBTA and PANYNJ tolls, including those on crossings leading directly to or from the Manhattan CBD, are not included in the revenue calculations.

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These numbers indicate that residents would be paying more than visitors. Not only will CBD residents be paying more to travel, they will also be paying more for all goods and services as the costs of CBD tolls are passed down to them. This does not seem fair and appears to be punitive. Please clarify.

4A.5.2 *Crossing Credits*

Four of the seven analyzed tolling scenarios offer a range of crossing credits to vehicles that pay tolls on TBTA and PANYNJ bridges and tunnels. While the location and amount of the crossing credits differ in those tolling scenarios,³⁰ common general effects include the following:

- Some drivers who continue to drive to the Manhattan CBD would choose a different route based on the introduction of Manhattan CBD crossing credits.
- Crossing credits would increase the attractiveness of TBTA East River facilities (Hugh L. Carey Tunnel, Queens-Midtown Tunnel, and the Robert F. Kennedy Bridge) compared to existing free bridges. The travel model indicates that increased demand for these routes has the effect of increasing auto and truck travel times from much of Long Island to the Manhattan CBD market due to additional congestion in the Queens-Midtown Tunnel. While these effects are observed in the four tolling scenarios that would provide crossing credits, they are less prevalent in the three tolling scenarios that would not provide crossing credits. With crossing credits in place, there are certain travel markets where travel times and congestion could increase due to the Project, while other travel markets could see less congestion compared to tolling scenarios without crossing credits.
- For the Hudson River crossings in three of the tolling scenarios, some drivers bound to the Manhattan CBD from west of the Hudson River would divert to the Lincoln Tunnel and Holland Tunnel based on the availability of crossing credits to offset existing tolls as part of the total vehicle cost with Manhattan CBD tolling. As a result, volumes on the George Washington Bridge to Manhattan would decline; however, this decline is reversed in the tolling scenario that offers crossing credits to George Washington Bridge users.
- Tolling scenarios with crossing credits lead to lower VMT in environmental justice communities than tolling scenarios without crossing credits.

4A.5.3 *Diversions/Toll Avoidance*

Every tolling scenario would cause diversions of traffic by drivers wishing to avoid or minimize the tolls paid. The particular diversions for different travel markets are explained in more detail in this chapter, but important themes are:

- Modeling of the CBD Tolling Alternative indicates that passenger auto trips (i.e., not truckers) have three basic ways to avoid paying the CBD toll:
 - Choose a new and different path to avoid the CBD toll.
 - Switch to another mode such as transit.
 - Choose not to make the trip to the Manhattan CBD.

³⁰ Credits offered in tolling scenarios are described in Chapter 2, “Project Alternatives,” as well as in the narrative descriptions of the tolling scenarios found in “Appendix 4A.2, Transportation: Travel Forecast Tolling Scenario Summaries and Detailed Tables (2023 and 2045).”